

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 1:22-cv-03104

ABDELHAFIZ M. NOFAL, : DEPOSITION OF:
: Plaintiff, NATALIE COHEE
: vs. :
IMCMV TIMES SQUARE, LLC, :
d/b/a MARGARITAVILLE :
RESORT TIMES SQUARE, :
Defendant.
-----:

TRANSCRIPT of testimony as taken by and
before PATRICIA A. SANDS, a Shorthand Reporter
and Notary Public of the States of New York and
New Jersey, via VERITEXT VIRTUAL, on Tuesday,
March 21, 2023, commencing at 10:07 in the
forenoon.

Job No.: P1-5820796

1 A P P E A R A N C E S:

2

3 AKIN & SALAMAN

4

45 Broadway, Suite 1420

5

New York, New York 10006

6

212 825-1400

7

BY: OLENA TATURA, ESQ.

8

For the Plaintiff

9

CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

10

175 Pearl Street, Suite C-402

11

Brooklyn, New York 11201

12

646-341-6544

13

BY: ANJANETTE CABRERA, ESQ.

14

For the Defendants

15

16

17

18

19

20

21

22

23

24

25

1

I N D E X

2

3

WITNESS

EXAMINATION

4

Natalie Cohee

5

Ms. Tatura

4

6

Ms. Cabrera

100

7

E X H I B I T S

8

NUMBER	DESCRIPTION	PAGE
--------	-------------	------

9

10	1	Complaint	37
11	2	Email	62
12	3	ADA document	64
13	4	Schedule	66
14	5	Schedule	70
15	6	Schedule	73
16	7	Witness statement	75
17	8	Performance Correction Notice	78
18	9	Personnel Action Form	82
19	10	Handwritten notes	89
20	11	Roberts statement	96

21 INDEX TO REQUESTED INFO

22 PAGE LINE

23	24	14	Employee Handbook
24	72	3	Layout of Business
25	84	21	Line Cooks Hired

1 F E D E R A L S T I P U L A T I O N S

2 IT IS HEREBY STIPULATED AND AGREED by
3 and between the parties hereto, through their
4 respective counsel, that the certification,
5 sealing and filing of the within examination
6 will be and the same are hereby waived;

7 IT IS HEREBY STIPULATED AND AGREED that
8 all objections, except as to the form of
9 question, will be reserved to the time of trial;

10 IT IS HEREBY STIPULATED AND AGREED that
11 the within examination may be signed before any
12 Notary Public with the same force and effect as
13 if signed and sworn to before this Court.

14

15

16

17

18

19

20

21

22

23

24

25

1 N A T L I E C O H E E ,
2 110 Hoboken Avenue, Apt. 115
3 Jersey City, New Jersey 07310,
4 having been sworn, was examined
5 and testified as follows:

6 DIRECT EXAMINATION

7 BY MS. TATURA:

8 Q Good morning, Ms. Cohee. This is
9 Olena Tatura from Akin Law Group. I represent
10 the plaintiff in this matter. This morning I
11 will be asking you some questions with regard
12 to the lawsuit that he brought against the
13 Margaritaville Resort.

14 I'm just going to ask you to have your
15 responses verbal, because the court reporter
16 that we have today cannot take down any hand
17 gestures or head nods.

18 Okay?

19 A Yes, ma'am.

20 Q If you do not understand the
21 question, please let me know so I can rephrase
22 it, because if you do provide your response, I
23 will you assume that you understood my
24 question.

25 Is that all right?

 A Yes.

1 Q If you need to take a break, let me
2 know, we can take that at any time. I'm just
3 asking if there is a pending question, that you
4 provide your response before we take such
5 break.

6 All right?

7 A Yes.

8 Q Do you understand that you are under
9 oath today and sworn to tell the truth?

10 A Yes.

11 Q And do you understand that your
12 testimony today is given as if we were in the
13 courtroom and under the penalty of perjury?

14 A Yes.

15 Q Is there anything that may impact
16 your ability to testify truthfully today?

17 A No, ma'am.

18 Q What have you done, if anything, to
19 prepare for today's deposition?

20 A I mean, not much really at this
21 point. You know, I have just gone over my own
22 notes, concepts of what's happened within this
23 case with your client, but not too much
24 preparing really.

25 Q And have you produced a copy of those

1 notes to your attorney?

2 A Yes.

3 Q Have you reviewed any other
4 documents, aside from the notes you've
5 referenced?

6 A Just the actual lawsuit claim from
7 your client.

8 Q The complaint?

9 A Yes.

10 Q And did you speak with anybody from
11 Margaritaville about today's deposition?

12 A No, just that I was going to a
13 deposition.

14 Q Who did you say that to?

15 A My general manager at the building,
16 to make sure he was aware that I would not be
17 able to be interrupted today.

18 Q What is his name?

19 A Michael Roberts.

20 Q And have you ever been deposed
21 before?

22 A No, ma'am.

23 Q Have you ever been a witness to a
24 lawsuit?

25 A No, ma'am.

1 Q Have you ever been a party to a
2 lawsuit?

3 A No.

4 Q Have you ever been involved in any
5 matter involving debt collection in Arizona in
6 2004?

7 A No.

8 Q Have you ever been involved in a
9 matter involving debt collection in Florida in
10 2014?

11 A Not to my recollection, no.

12 Q Are you aware if Margaritaville was
13 named as a defendant in any employment
14 discrimination lawsuit, other than the current
15 one?

16 A Not to my knowledge, no.

17 Q Are you aware if any employee of
18 Margaritaville sent an intention to sue for
19 employment discrimination, other than the
20 plaintiff in this case?

21 A Not to my knowledge, no.

22 Q Are you aware of an employee named
23 Salaam that could allege employment
24 discrimination against Margaritaville?

25 A No, I have no idea who that is.

1 Q Are you aware if there was another
2 employee of Indian national origin that was
3 fired and rehired following his complaint of
4 employment discrimination?

5 A Not to my knowledge, no.

6 Q What is your date of birth? And we
7 will redact the same from the record.

8 A XX/XX/XX.

9 Q And how old are you today?

10 A Thirty-eight -- 37, I will be 38.
11 Sorry.

12 Q What are the last four digits of your
13 Social Security number?

14 A 5654.

15 Q What is your email address?

16 A Personal or work?

17 Q Both.

18 A Ncohee at IMCMV dot com. Personal is
19 Natalie170 at AOL dot com.

20 Q Thank you.

21 Did you ever send any emails from your
22 work email to your personal email related to
23 this lawsuit or the plaintiff?

24 A No. The only email from my personal
25 email was when Mr. Nofal had sent me an email,

1 and then when I responded via phone, it has
2 both my email accounts, and I think it ended up
3 picking up my personal email. And then
4 Mr. Nofal had emailed me requesting a day off
5 to my work email as well.

6 Q Do you know what day off we are
7 talking about, what date?

8 A It would have been sometime in June,
9 maybe the 25th, ah -- between the 22nd and the
10 25th, one of those days.

11 Q 2021?

12 A 2021, yes, ma'am.

13 Q Okay, thank you.

14 Do you have any social media accounts?

15 A Just Facebook. I think there might
16 be an Instagram account, but not like an active
17 Instagram account. I think it was opened up
18 when I worked at DoubleTree, I don't think I
19 ever posted anything on it. It's not an active
20 account for sure.

21 Q Did you ever post anything on
22 Facebook, Instagram, or any other social media
23 account anything related to this lawsuit, the
24 plaintiff?

25 A No, ma'am.

1 Q And where were you born?

2 A Indianapolis, Indiana.

3 Q And how long have you lived at this
4 110 Hoboken Avenue in Jersey City?

5 A I moved to New York to that address
6 in May, I think May of 2021.

7 Q And prior to that where did you live?

8 A I resided in the hotel for November
9 of -- sorry, I have to go in my mind --
10 November of 2020 until May, so pretty much I
11 was back and forth from Florida and New York.
12 So I would say April to May -- March, sorry,
13 March to May I was in a hotel here in the city
14 preparing to open up the venue. And then prior
15 to that I was in Florida.

16 Q And what's the address of the hotel
17 that you resided?

18 A I honestly don't know the actual
19 hotel address, but it was the Hampton -- it was
20 multiple different hotels from Secaucus to
21 Hampton. They just kind of bounced me around
22 to whatever had availability.

23 Q Okay. And in Florida what was the
24 address that you resided prior to living in the
25 hotels?

1 A 5367 Deer Creek Avenue, Orlando,
2 Florida 32821.

3 Q And how long did you reside at that
4 address?

5 A It's my main permanent residence, I
6 have been there since 2007.

7 Q Are you married?

8 A Yes, ma'am.

9 Q I apologize for asking you this, but
10 have you ever been convicted of a felony?

11 A No, ma'am.

12 Q Have you ever filed for bankruptcy?

13 A No, ma'am.

14 Q And what is your highest level of
15 education?

16 A I have an associate's degree in
17 culinary, ah, occupational science.

18 Q Where did you obtain that degree?

19 A In Arizona. Le Cordon Bleu, in
20 Scottsdale, Arizona.

21 Q And when did you obtain that
22 associate's degree there?

23 A That was, ah -- I graduated in 2003.

24 Q Are you currently employed at
25 Margaritaville?

1 A Yes, ma'am.

2 Q And when did you start working there?

3 A August of 2020.

4 Q And from August 2020 to present, what
5 positions did you have?

6 A Executive chef for Margaritaville,
7 hired for New York. But until we opened in
8 June of 2021, I was in multiple different
9 venues.

10 Q What venues?

11 A I was in Pigeon Forge, Tennessee; Las
12 Vegas; San Antonio; Bayside Miami.

13 Q Did you work for different hotels, or
14 did you work for Margaritaville at the cities
15 you mentioned?

16 A They were all restaurants,
17 freestanding restaurants. One was attached to
18 a hotel, which would be the Las Vegas property.

19 Q Are these venues reflected on your
20 resume?

21 A No, it's just part of Margaritaville.

22 Q Is there any reason why you didn't
23 put them on your resume?

24 A No, because I have been hired as
25 Margaritaville, so bouncing around wasn't

1 relevant to me.

2 Q Okay. When did you work at
3 DoubleTree?

4 A DoubleTree I was hired in 2007, and I
5 left in June, June 25th is when I accepted this
6 offer, so June 25th of 2020.

7 Q Did you leave on your own accord or
8 were you fired?

9 A Yes, ma'am, I left on my own.

10 Q Why did you resign from DoubleTree?

11 A I got the offer to take for
12 Margaritaville to come open up the Times Square
13 property.

14 Q So your resume says January 2008,
15 your LinkedIn says February 2008, and you now
16 testified that you started in 2007, can you
17 clarify the discrepancy?

18 A Uhm, so January -- December of 2007 I
19 officially was interviewed for the DoubleTree,
20 so it might end up being January 11th,
21 something around there. Between December and
22 January, roughly. Not exactly sure of the
23 exact dates it's been so long.

24 Q Okay, thank you.

25 And prior to DoubleTree where did you

1 work?

2 A Prior to DoubleTree -- sorry, I have
3 to backtrack. Prior to DoubleTree I was at
4 Pomegranate Restaurants. Then I was with Ocean
5 Properties in Sheraton, Key West, St. Croix --
6 kind of all over the place.

7 Q And again, is there any reason why
8 you did not reflect every job you worked at on
9 your resume?

10 A Uhm, yeah, I just don't -- I choose
11 the ones that had the longevity. I mean, Ocean
12 Properties was very profound for me, so it was
13 a big company for me to work for. Pomegranate
14 Restaurants was a kosher restaurant, it was an
15 8-month thing until they closed down, and then
16 I got asked to go to Orlando to open up the
17 restaurant, I mean the hotel at DoubleTree. So
18 Pomegranate's had closed down, it was
19 irrelevant, I mean, pretty -- you know, it's
20 closed down at this point. So they weren't
21 very successful.

22 Q And how did your employment at Ocean
23 Properties end -- did you get fired, did you
24 resign?

25 A No, I got transferred to St. Croix.

1 And then after St. Croix, by then, at that time
2 my fiancé, we decided to move back to the
3 United States. He stayed working with Ocean
4 Properties, and since he was a direct
5 report, it was better for me to pick up with
6 another company versus staying in the same
7 company.

8 Q Did anyone at Ocean Properties ever
9 complain that they feel like they were
10 discriminated against by you on the basis of
11 their disability or national origin?

12 A Absolutely not.

13 Q And the same questions for
14 DoubleTree, did anybody at DoubleTree ever
15 complain that they felt like they had been
16 discriminated against by you on the basis of
17 their disability or national origin?

18 A Absolutely not, never had a complaint
19 against me.

20 Q How about Margaritaville, did
21 plaintiff, Mr. Nofal, ever complain to you that
22 he felt like he was discriminated against by
23 you on the basis of disability or national
24 origin?

25 A No, ma'am.

1 Q And anybody at Margaritaville, other
2 than plaintiff, did they allege any sort of
3 complaint of discrimination against you on the
4 basis of their disability or national origin?

5 A No, this is my first complaint.

6 Q As the executive chef at
7 Margaritaville, what are your duties and
8 responsibilities?

9 A I'm there to maintain an effective
10 organization, making sure that recipes are
11 adhered to, product quality is adhered to,
12 cleanliness, and to run the day-to-day shift
13 and make sure that all of my underneath
14 managers are basically running the day-to-day
15 operation and I'm overseeing them.

16 Q How many managers do you currently
17 supervise?

18 A Four. Four managers, two
19 supervisors.

20 Q And from June 2021 to September 2021,
21 how many employees did you supervise?

22 A Throughout the entire time or -- just
23 because right now, I mean, they have come and
24 gone. So on average it's about 42, but
25 throughout the time --

1 Q Average is fine.

2 A About 42.

3 Q Okay. And did you supervise line
4 cooks as well?

5 A Line cooks, prep cooks, dishwashing.

6 Q What's the difference between prep
7 cook and line cook?

8 A Prep cook is basically an entry level
9 position that does all of the main recipes and
10 the bulk prep for the day-to-day. And then
11 line cooks are doing shift prep, which is
12 basically setting up their station and doing
13 the basic prep within their shift, and prep
14 cooks prep the bulk items.

15 Q Are they in an equal position, or is
16 anybody higher?

17 A So I have lead line cooks and I have
18 lead prep cooks, those are the same basically
19 tier level. They can be paid the exact same
20 rate, they have the same skill sets. We have
21 entry levels on all areas, in every department
22 within my kitchen.

23 Q Do you have authority to hire and
24 fire employees?

25 A Yes, ma'am.

1 Q And did you have that authority from
2 June 2021 to September 2021?

3 A Yes, ma'am.

4 Q Who do you currently report to, who
5 is your immediate supervisor?

6 A Jason Tremper.

7 Q And what is his position?

8 A He is the VP of food and beverage
9 operations.

10 Q Is Kylie Featherby still employed --

11 A She is deceased.

12 Q -- at Margaritaville?

13 A She has passed away.

14 Q I'm sorry to hear that.

15 A Thank you.

16 Q Adam Nolan Charles, is he still
17 employed with Margaritaville?

18 A No, he resigned on June 5th of
19 2000 -- was it June 5th or July 5th -- I don't
20 want to misstate it, it's either June 5th or
21 July 5th, but he resigned.

22 Q According to plaintiff, he was fired,
23 is there any reason to believe that that's not
24 true?

25 A The plaintiff -- Adam was fired --

1 no, Adam never got fired, he walked out in the
2 middle of a shift.

3 Q And who is currently occupying the
4 position of the executive sous chef?

5 A Darius Logan.

6 Q Who is José Gomez Dominguez?

7 A He is my senior sous chef.

8 Q Is he still employed?

9 A Yes, ma'am.

10 Q And who is Claudia Rodriguez?

11 A She was a former sous chef.

12 Q When did her employment end?

13 A She went back to Mexico on July 19th
14 of 2022. June, I think it might have been
15 June 19th, sorry.

16 Q Did she resign?

17 A Yes, ma'am. She put in her two
18 weeks' notice, she moved back to Mexico and
19 then back to Texas.

20 Q And who is currently the sous chef?

21 A I have two additional ones, which is
22 Tim Bly and Everton Phipps.

23 Q And who is Tyre Washington?

24 A Tyre Washington, he was a supervisor.

25 Q And why is he no longer employed at

1 Margaritaville?

2 A He went to work with PHS, which is
3 the contract company, and they had released him
4 based on his attendance, I believe.

5 Q Was he fired?

6 A Yes, PHS had released him.

7 Q And who was Janina Diaz?

8 A Janina Diaz was a supervisor. She
9 was a supervisor.

10 Q Why did her employment end?

11 A She resigned within -- before even
12 opening. I think two weeks prior to opening,
13 like officially opening the property.
14 Something where -- I think it was about, uhm,
15 she only wanted to work the morning shift, and
16 the p.m. shift was not suitable for her, or
17 something along that line.

18 Q Does Margaritaville have an HR
19 department?

20 A Yes, ma'am.

21 Q Where is it located?

22 A Orlando, Florida.

23 Q What is your understanding of the
24 procedure that Margaritaville has in place in
25 case employees have some complaints of

1 discrimination that they would like to lodge?

2 A Any complaints or things that are
3 brought to our attention is immediately
4 directed to our HR department, which is Hector
5 and Pedro. And from that moment on they would
6 take care of, they would continue it on and do
7 their investigation.

8 Q So if some of the employees that you
9 supervise wanted to complain of discrimination,
10 can they go directly to you, or do they have to
11 go to HR, including Hector and Pedro?

12 A If they wanted to come to me, they
13 could come to me if they felt comfortable. If
14 they didn't feel comfortable, by all means they
15 could go to Hector and Pedro. Typically most
16 of them follow chain of command, but not in
17 every circumstances would you follow chain of
18 command if you felt uncomfortable.

19 Q How would employees know that they
20 have to reach out to Hector or Pedro, or
21 anybody else at HR?

22 A During the orientation training that
23 every employee would go through, all of that is
24 brought up. There is, I think, even a flyer
25 hanging in the kitchen at that point when IMCMV

1 was involved with Margaritaville at the
2 property. Now it's PHS, so PHS has their own
3 policies and procedures.

4 Q And do employees get some sort of
5 employee handbook in addition to flyers?

6 A Everything was given via online.
7 Like through their, ah -- when they sign up
8 with the application, they go through this
9 whole Paycor process, and on the Paycor you
10 have the option to download everything that you
11 have gone through.

12 And I think this particular training
13 everybody receives some type of pamphlet,
14 booklet, during our, uhm, basically the week of
15 training, is what we call it.

16 Q Aside from the training that
17 employees receive at the orientation, is there
18 any training that is conducted every year or
19 every two years?

20 A Everybody has a HotSchedules
21 application, which basically goes into our
22 Margaritaville University. And we have courses
23 and things that are constantly uploaded that
24 get assigned to you that you would continuously
25 click on, and it would alert you via email that

1 you have, you know, a sexual harassment, or you
2 have, you know, it could be a MenuSpec training
3 that you have to do that will constantly pop
4 up.

5 Q And would there be any document that
6 would prove that employees, in fact, did such
7 training and listened to all of the hours?

8 A Yes, you would -- it's pretty much
9 time stamped. So once they complete it, it
10 sends it over explaining this task was
11 completed. And managers all the way up to
12 executive levels kind of have access to that.
13 And some of them even require you to print out
14 a certificate.

15 Q You mentioned previously that some
16 sort of investigation will be done if there are
17 complaints of discrimination lodged with the HR
18 department.

19 Do you know who would be in charge of that
20 investigation?

21 A That would be Hector and Pedro, and
22 anybody else that would be, I guess involved
23 into what might be brought up.

24 Q Do you know when Hector and Pedro
25 started working at Margaritaville at the HR

1 department?

2 A Sorry, ma'am, I do not have that
3 information.

4 Q And who would know that?

5 A Both of them would know.

6 Q Do they work in Florida?

7 A Hector works over in Arizona and
8 Pedro works in Orlando.

9 Q Did you personally receive any
10 employee handbook from Margaritaville?

11 A Yes.

12 Q Do you still have a copy of it?

13 A It's on my computer.

14 MS. TATURA: Anjanette, I don't
15 believe any employee handbooks were
16 exchanged in discovery.

17 So to the extent there is such
18 employee handbook, I would request that a
19 copy be provided to us. And I can follow
20 up in writing.

21 MS. CABRERA: Okay, yes. I just ask
22 that any requests, just follow up in
23 writing.

24 That's weird. Are you sure you
25 didn't get that?

1 MS. TATURA: Yes. There was a
2 policy, conduct, how to --

3 MS. CABRERA: Policy conduct --

4 MS. TATURA: Yeah, but I didn't see
5 any employee handbook. Anyway, I will
6 follow up in writing.

7 Q When was the last time that you
8 reviewed the employee handbook?

9 A Maybe not even two months ago, around
10 there.

11 Q What was the purpose of your
12 reviewing it?

13 A We had our annual like refresher
14 courses, everybody had to pretty much do the
15 refresher.

16 Q How often does that annual refresher
17 take place?

18 A Annually. Once a year.

19 Q And did you also receive some kind of
20 a training designed to prevent employment
21 discrimination at Margaritaville?

22 A Yes. We went through quite a few
23 different, you know, sexual harassment,
24 discrimination, pretty much all of that we had
25 gone through. I think even maybe two or three

1 times since I've been with the company I have
2 received a few training guides, or courses that
3 were given to me.

4 Q And would there be some documents
5 showing that you, in fact, took part in those
6 trainings?

7 A I think those were given already.

8 Q I don't believe they were, that's why
9 I'm asking.

10 A Yeah. It would be on my online
11 courses, yes.

12 Q You mentioned Margaritaville
13 University.

14 Can you tell me more about that?

15 A It's basically their platform for all
16 of the information that the company has for our
17 trainings.

18 Q Do you have to have a log-in password
19 to get in?

20 A Yes, you need to be an employee of
21 Margaritaville.

22 Q Aside from being an employee, do you
23 need to have log-in information, like a user
24 name, password?

25 A Yes, that's the only way you could

1 access it. It would be given to you upon hire,
2 it's basically whatever your HotSchedule log-in
3 is that you would sign in to to get your
4 schedule, it's the same platform to log-in to
5 get to Margaritaville University. Only you
6 would have an access to that.

7 Q Okay, thank you.

8 How long would the training last, the one
9 that Margaritaville conducted during your
10 employment?

11 A Any course could be five minutes to
12 45 minutes. I think some of them might have
13 even been an hour.

14 Q And while you're taking that course
15 or training, are you taking any notes usually?

16 A Many of them like those little
17 quiz-lets, that you have to answer. Tests.

18 Q Would you still have a copy of those?

19 A Not on my person, no.

20 Q How would you find out if there was a
21 training coming up that you would have to
22 complete as part of your employment?

23 A It would be in your HotSchedule, like
24 messaging. Or for me, like a manager, it might
25 come to my email letting me know that I have a

1 training.

2 Q So based on the training that you
3 received during your employment to date, what
4 is your understanding of what discrimination
5 is?

6 A I mean, it's basically having bias
7 against somebody for something that they cannot
8 cause, ah, that they have no, basically, way to
9 change it. Change themselves or change it in
10 their life.

11 Q Are you familiar with Abdelhafiz
12 Nofal, the plaintiff in this case?

13 A Yes, ma'am.

14 Q When was the first time you met him?

15 A Approximately June 5th.

16 Q Was that during the orientation?

17 A Yes.

18 Q Do you know when was the date when
19 plaintiff was hired?

20 A I think the end of May, so it would
21 have to be on the last hiring spree of May 25th
22 to May 31st.

23 Q And who interviewed plaintiff?

24 A I believe Adam did.

25 Q And who hired him?

1 A I believe Adam did.

2 Q Did Adam run by you whether he should
3 hire plaintiff, or did he have authority to do
4 the hiring on his own?

5 A Adam did not run it through me. On
6 the grand opening hiring, all managers were
7 eligible to hire. We were doing a mass hiring
8 spree, so we hired about 130 employees within a
9 five-day period.

10 Q And what was the plaintiff's position
11 that he was hired for?

12 A A line cook.

13 Q Line cook. Is there any other
14 position that plaintiff was hired for?

15 A No, he was just hired as the
16 breakfast line cook.

17 Q And how often would you interact with
18 plaintiff during your employment and his
19 employment at Margaritaville?

20 A Uhm, I would say roughly 15 to 20
21 times that I physically worked with him on a
22 side-by-side basis, or within the line. Other
23 than that, a "hello, how are you", type of
24 interaction, as I was getting ready to open up
25 the building. I didn't spend much one-on-one

1 time with cooks at that point, that's what the
2 managers were doing.

3 Q And what were the duties and
4 responsibilities of plaintiff as a line cook?

5 A To set up the station, prep up the
6 station, make sure that he had all of his
7 products, tools, and things needed for his
8 shift to run an effective shift, adhere to our
9 recipes, policies and procedures, and to
10 effectively in a timely manner produce the food
11 that was requested of him.

12 Q And so if he was running out of some
13 ingredients necessary for service of meals to
14 the customers, where would he get more of those
15 supplies?

16 A All of the employees have access,
17 they basically go down to the prep kitchen or
18 the SC2 storage room. And so any employee that
19 would run out of product, they would request to
20 leave the line to go refill their station or
21 refill their product.

22 If it was a busy moment, then he would
23 request that some assistance of can somebody
24 run down and get this for me, as the line is
25 busy. It's pretty much up to the manager to

1 allow him to leave the station to go downstairs
2 to get the product that they don't have, or the
3 manager can send somebody else to go get the
4 product.

5 Q Was that on the same floor as the
6 line, or was that downstairs, upstairs,
7 anywhere?

8 A Yes, it was downstairs. We had the
9 prep kitchen, which is on the level C, and then
10 SC2, which is on basically negative floor 2,
11 which is two floors down.

12 Q And just to clarify. You did have a
13 supervisory authority over the plaintiff during
14 his employment; correct?

15 A Yes, ma'am. I'm the direct report as
16 I'm the executive chef. So anytime he needed
17 to go get something -- he could come to me or he would go
18 to one of my managers.

19 Q And who determined plaintiff's work
20 schedule?

21 A Myself.

22 Q Would that be based on the needs of
23 the business, a shortage of employees, anything
24 else?

25 A It's based on needs of business and

1 what's going on day to day.

2 Q Aside from yourself, anybody else
3 have the right to designate hours for
4 plaintiff?

5 A Any of my managers could have. At
6 that moment we were in the grand opening, so I
7 would have been the only one to make the actual
8 physical schedule. But I'm sure many
9 adjustments were made during the shift, sending
10 people home early or asking people to come in
11 late, due to just overstaffing or under-
12 staffing.

13 Q And I'm sorry if I asked you this
14 before, when was the grand opening?

15 A The grand opening was June 25th.

16 Q 2021?

17 A Yes, ma'am.

18 Q Was plaintiff's performance
19 satisfactory? Work performance.

20 A Uhm, at times.

21 Q When was the first time that you
22 noticed that plaintiff's performance may have
23 been less than satisfactory?

24 A Around mid-June.

25 Q What were the issues that you noticed

1 in mid-June that were less than satisfactory?

2 A Mr. Nofal was working with raw beef
3 and raw chicken, and at that time he had taken
4 the raw beef and chicken and put it on to a
5 ready-to-eat cutting board with romaine,
6 tomatoes, and ready-to-eat product.

7 As he was working with those ingredients,
8 he was, uhm, being very sloppy and allowing the
9 contamination of the product to get all over
10 the place. Which was -- is very severe, I
11 mean, as I think everybody is aware with
12 salmonella.

13 So that became a pretty crucial moment at
14 that moment, at that time, of his sanitation
15 and hygiene of working with food. That became
16 a concern of pretty much everybody that was
17 working on the line.

18 Q If it was so severe, is there any
19 reason why he wasn't issued a writeup?

20 A I always believe in coaching and
21 counseling verbally first. I don't think
22 everything needs to be given a writeup, you
23 know, I think a lot of things can be taught
24 through teaching. So I believed at that moment
25 it's a learning experience. We are in the

1 middle of training. I had entry level all the
2 way to sous chefs that were line cooks at that
3 point. So you're kind of learning who has
4 skill sets and where their skill sets are. And
5 so during each training moment, you're not
6 going to the first step is to write somebody
7 up, I think you can coach and counsel before
8 you get to that step.

9 Q Is that what you did, you coached and
10 counseled the plaintiff as to that incident?

11 A I'm sorry, you cut out.

12 Q Is that what you did, you coached and
13 counseled the plaintiff as to that incident?

14 A Yes, ma'am.

15 Q And would there be any document to
16 prove that you, in fact, engaged in such
17 counseling?

18 A No, there would be no -- I wouldn't
19 be writing it up, because writing it up would
20 pretty much go into his file.

21 So that would be a negative for me, you
22 know, for him. I wouldn't want to immediately
23 go into writing something negative up about an
24 employee when I was just trying to have that
25 first interaction on, hey, listen, this cannot

1 happen, you must wash your hands, you must make
2 sure that you're handling raw beef first, and
3 then handle the raw chicken, you can't have it
4 by the lettuce, you can't have it by the
5 tomatoes.

6 Q Is this the policy of Margaritaville
7 to give coaching and counseling first, or is
8 this something that you decided to do as the
9 executive chef?

10 A I think all of us, you know, in a
11 management position, I don't know if it's
12 actually a policy, I mean, everybody, the first
13 step to any type of coaching and counseling is
14 to have that verbal one on one, because we are
15 leaders, we're training at this point. This
16 was a training versus a -- a training issue,
17 versus something that would cause him to get a
18 writeup. It's not a code of conduct, it's not
19 something like that, this was more of a
20 training of somebody just not knowing how to do
21 their job.

22 Q And when was the next issue that you
23 felt like was less than satisfactory work
24 performance?

25 A It would have been probably, uhm,

1 maybe a week later, but unfortunately I was not
2 actually a witness to that, so it was a hearsay
3 moment between two line cooks.

4 Q What was the incident?

5 A The incident was regarding following
6 proper policies and cooking techniques on
7 sauté. Him and another line cook had got into
8 disagreement on following the recipes that were
9 given to him. Mr. Nofal basically said he had
10 been a chef his whole life, he knows what he's
11 doing, so at this point he knows how to sauté
12 the proper way, but he was not following the
13 recipe that was given to him.

14 Q What was that line cook's name?

15 A Marcelo Cortez.

16 Q Is he still employed?

17 A Yes, ma'am.

18 Q What is his current position?

19 A Line cook.

20 Q Is there any reason why plaintiff
21 wasn't issued a writeup a week later after the
22 first incident?

23 A I was not involved into it. It was
24 brought to my attention afterwards, and the
25 corporate chef sat down with the two.

1 Q Who is the corporate chef?

2 A Dan Murray.

3 Q Do you know if there were any
4 documents that would reflect any meetings or
5 sitting down between the three of them?

6 A Not to my knowledge.

7 Q Aside from the mid-June incident and
8 then the incident taking place a week later, is
9 there any other incident that happened that
10 made you believe that plaintiff's performance
11 was less than satisfactory?

12 A Not until we started working
13 breakfast.

14 Q And would that be August 2021, or no?

15 A Yes, roughly August 2021 is when we
16 officially started doing breakfast.

17 MS. TATURA: Let's take a look at the
18 first document that will be marked as
19 Exhibit 1. This is the complaint filed in
20 this action. Let me just put it on the
21 screen.

22 (Exhibit 1 marked for
23 identification.)

24 Q Have you seen this document before?

25 A Yes, ma'am.

1 Q When was the last time you saw this
2 document?

3 A That would have been roughly February
4 of this year.

5 Q What was the reason that you looked
6 at this document in February?

7 A To actually fully read it.

8 Q Why did you decide to wait until
9 February 2023 to look at this document to fully
10 read it?

11 A Because it was originally sent out to
12 corporate, and it was given to me on, I
13 think -- or a portion of it I had received
14 roughly around the time that he had sent it
15 over, but most of that stuff gets straight to
16 HR.

17 Q Have you discussed this document with
18 anybody other than your lawyer?

19 A Just Kylie Featherby.

20 Q And did you discuss that verbally, by
21 text message, by email?

22 A Verbal.

23 Q Do you understand what allegations
24 plaintiff has in this lawsuit?

25 A Yes, ma'am.

1 Q Let's go to paragraph 22.

2 A Yes, ma'am.

3 Q So you see where it says, in
4 paragraph 2:

5 "Plaintiff suffers from diabetes - a
6 chronic metabolic disease characterized by
7 elevated levels of blood glucose."

8 Did you know that the plaintiff had
9 diabetes?

10 A No, ma'am. I'm sorry.

11 MS. CABRERA: Let her finish.

12 THE WITNESS: Sorry.

13 Q And let's look at the paragraph 23.

14 "Because of diabetes, plaintiff had an
15 impairment of his skin (toe), which prevented
16 him from the exercise of his normal bodily
17 functions, such as walking."

18 Do you have any reason to believe that
19 that's not accurate?

20 A I have no idea if his diabetes had
21 anything to do with his -- anything to do with
22 it.

23 Q Didn't you see plaintiff limping
24 during his employment at Margaritaville?

25 A No, ma'am.

1 Q Did you know that plaintiff had a
2 surgery during his employment with
3 Margaritaville?

4 A No, ma'am. I didn't know he actually
5 had a surgery.

6 Q Isn't it true that in July of 2021
7 plaintiff showed you a picture of his toe, that
8 you commented as looked very blue?

9 A No, ma'am, I've never seen any
10 pictures of anything from Abdel.

11 Q Let's look at paragraph 24:

12 "Despite his disability, plaintiff was
13 able to do the essential duties of his job as
14 the sous chef, and work at the designated to
15 him sauté and grill stations at
16 Margaritaville."

17 We already established that he worked as a
18 line cook, according to you; correct?

19 A Yes, ma'am. He was never a sous
20 chef.

21 Q Is there any reason to believe that
22 plaintiff was not able to do the essential
23 duties as the line cook during his employment
24 with Margaritaville?

25 A No, based off of everything, he

1 should have been just fine to do a line cook
2 position.

3 Q Let's look at paragraph 26, where it
4 says:

5 "From July 26, 2021 to August 26, 2021, as
6 per his doctor's recommendation, plaintiff took
7 a short-term disability leave related to his
8 disability."

9 Do you recall plaintiff taking a leave of
10 absence?

11 A Yes, ma'am.

12 Q And do you know what that leave of
13 absence was for?

14 A He had a sore toe, I believe.

15 Q And do you know if plaintiff was
16 granted a leave of absence based on the
17 doctor's note, or something else?

18 A Once he handed in the documentation,
19 it was given over, and Hector, HR, approved the
20 leave of absence.

21 Q Did you personally receive any
22 doctor's note from plaintiff?

23 A Sorry, can you repeat that.

24 Q Did you personally receive any
25 doctor's note from plaintiff?

1 A I think the doctor -- the original
2 note that said to please be excused for roughly
3 30 days.

4 Q And how did you receive that -- by
5 email, in person, by fax, by text message?

6 A I believe that it was either via
7 email or via text. I don't believe it was
8 given in person. I don't believe it was given
9 in person.

10 Q And prior to taking a leave of
11 absence, what was plaintiff's schedule?

12 A Just like all of the new hires,
13 everybody was on a five-day, ah, pretty much
14 training, orientation, work schedule getting
15 ready. I mean, we spent a lot of time,
16 everybody spent a lot of time getting ready to
17 open up the building. So everybody was on full
18 shift. Some people I think might have even
19 worked six, seven days.

20 Q Is it fair to say that plaintiff was
21 employed on a full-time basis prior to taking
22 his leave of absence?

23 A We didn't hire anybody on a full-time
24 basis during the grand opening, everybody was
25 just given the maximum hours that they could

1 physically work, because there was so much to
2 be done.

3 Q Let's look at paragraph 30:

4 "Plaintiff was assigned to work on the
5 breakfast shift from 8:00 a.m. to 3:00 p.m. on
6 Friday, 6:00 a.m. to 2:00 p.m. on Saturday, and
7 6:00 a.m. to 2:00 p.m. on Sunday."

8 I believe that was after he returned from
9 his leave of absence. Does this sound
10 accurate?

11 A Not quite, but it's pretty much in
12 the ballpark of it, 6:00 a.m. to 3:00 p.m. was
13 pretty much the schedule. I don't believe he
14 ever had an 8:00 a.m. to 3:00 p.m. schedule, it
15 would have been a 6:00 or a 7:00.

16 Q Do you know if plaintiff was assigned
17 more hours or less hours following his leave of
18 absence?

19 A He was assigned to all of the
20 breakfast shifts that we had, as he was --
21 that's what he originally was hired for. And
22 since his leave of absence, we had finally
23 started opening up the breakfast schedule, so I
24 put him on the shift that he had requested for
25 the breakfast shifts only.

1 Q So prior to taking the leave of
2 absence was he working on the breakfast shift
3 or some other shift?

4 A There was no breakfast shifts to be
5 had when we first opened, as we were still in
6 the grand opening month. So once grand opening
7 happened, we decided Labor Day weekend we would
8 start rolling out the breakfast buffet, I mean
9 breakfast restaurant. So pretty much right
10 when he came back was when breakfast started
11 opening.

12 Q Is there any reason why he was
13 assigned to work those breakfast shifts and no
14 longer the shifts that he was working prior to
15 taking his leave of absence?

16 A Yes, prior to even him taking a leave
17 of absence, he kept asking everyone, you know,
18 when is breakfast opening, when is breakfast
19 opening, I prefer the breakfast shift, I've
20 always worked breakfast shifts, when are you
21 opening breakfast.

22 Then when he came back, I let him know
23 breakfast is on, we're ready to open up
24 breakfast, and he will be the breakfast cook.
25 He was the only breakfast cook.

1 Q And did he know that it's not going
2 to be seven days a week, but only three days a
3 week?

4 A It wasn't only going to be three days
5 a week. We had just started the process of
6 opening up the breakfast. So we started off on
7 a Friday, Saturday, Sunday. And then the next
8 week was Friday, Saturday, Sunday, now we're
9 into Labor Day weekend. And then as time was
10 progressing, it was going to be more shifts.
11 We didn't do seven days a week breakfast until,
12 I think almost December.

13 Q 2021?

14 A 2021. Depending on holidays and what
15 the week was like, it could have been three
16 days, four days, or five days.

17 Q And as of today, is Margaritaville
18 serving breakfast seven days or three days?

19 A We are on full shift, on seven days
20 now.

21 Q Aside from plaintiff, who else worked
22 that breakfast shift following his leave of
23 absence?

24 A Following his leave of absence --
25 once Mr. Nofal no longer worked with us, I

1 worked the breakfast shifts for roughly two
2 weeks. And then after that, Efrain Vasquez was
3 hired.

4 Q When was he hired?

5 A I don't know the exact date, ma'am.

6 Q How much time do employees that work
7 breakfast shift have in order to get ready
8 before they start serving it to the customers?

9 A An hour and a half. Shifts start at
10 6:00 a.m., and breakfast opens at 7:30. I
11 think back then we might have even opened at
12 8:00 a.m.

13 Q And how about lunch, how much time
14 did employees have in order to get ready for
15 that shift?

16 A Employees come in at 9 o'clock for
17 lunch, and we open up at 11 o'clock. And there
18 is seven stations to be set up, versus
19 breakfast is one station.

20 Q And how about dinner, how much time
21 did employees --

22 A Dinner, they come --

23 THE COURT REPORTER: Sorry, there was
24 overtalk.

25 MS. TATURA: I'm sorry, my connection

1 is not working.

2 (Tech off the record.)

3 MS. TATURA: I'm sorry, did I get a
4 response?

5 (The prior partial question and partial answer
6 were read back by the reporter.)

7 Q So as to the dinner, how much time
8 did employees have in order to get ready to
9 serve dinner to customers?

10 A Zero minutes, they walk straight into
11 the line.

12 Q No work needed to be done, like prep,
13 restocking, produce, or if they were running
14 low on some ingredients?

15 A If the p.m. shift -- are you taking
16 about the p.m. shift?

17 Q Yes.

18 A The p.m. shift, they immediately walk
19 into the line straight onto the shift. Usually
20 what will happen is the lunch person that's
21 leaving will do a full restock before they go
22 home, to make sure that they have everything
23 set for the p.m. shift.

24 Then if during the shift something runs
25 out, they will ask can I leave the line to go

1 get this product, or can somebody go get this
2 product for me if they're going down.

3 Q What work do employees need to do in
4 order to get ready for the breakfast shift, in
5 order to be able to serve the customers?

6 A They walk into the kitchen, set up
7 basically the dish area, put out the trash
8 cans, turn on all of the equipment, start
9 cooking potatoes, make their pancake mix, make
10 oatmeal, make sausage, make hash browns. Uhm,
11 turn on pretty much everything for the line and
12 set up the plates. Pretty much it. That's
13 about it.

14 Q Do you think one and a half hours is
15 enough to do all of this work in order to get
16 ready for the breakfast shift?

17 A Yes, ma'am. After every shift the
18 day before -- we end breakfast at 11 o'clock
19 a.m., so you have from 11 o'clock a.m. until
20 3:00 p.m. that you go home to reset yourself
21 for the next day, so in the morning all you're
22 doing is basically cooking everything.

23 So you cook your bacon, your sausage and
24 your potatoes, and then at that point you're
25 turning on all of the equipment so everything

1 is within reach. If you choose not to set
2 yourself up appropriately the day before, then
3 you will find yourself running behind.

4 Q Right. So how about when the
5 breakfast is open only three days, like in
6 August 2021, would it be fair to say that on
7 Sunday employees were not able to get ready for
8 upcoming Friday, because that would be too many
9 days in between?

10 A No, ma'am. Actually, the day before
11 is actually the setup day. So in the Friday
12 shift, breakfast isn't served, that's just a
13 shift to set up for Saturday and Sunday.

14 So it's really only a two-day breakfast
15 shift. Friday was the actual setup day to prep
16 yourself to get ready for Saturday. And then
17 you work Saturday, Sunday. Everything that was
18 left over was given to the line, and then you
19 set up on Friday for the next weekend.

20 Q Okay, thank you. Let's go back to
21 the complaint. I'm just hoping I'm not going
22 to lose connection again. Just give me one
23 second.

24 Okay. Go to paragraph 35. Do you see
25 where it says:

1 "On August 27th, 2021 plaintiff complained
2 to Natalie Cohee about Margaritaville reducing
3 his work hours following his short-term
4 disability leave."

5 Is there any reason to believe that this
6 is not accurate?

7 A Yes, ma'am, that's not accurate.

8 Q He never complained to you about
9 Margaritaville reducing his work hours at all,
10 or on this date?

11 A No, about his disability, it had
12 nothing to do with his disability.

13 Q So what exactly did he complain about
14 to you? If he did.

15 A On or about August 27th, as he's
16 saying, he had asked me why was he only working
17 three days. I explained to him that he was
18 hired and had asked only for breakfast shifts,
19 per his request originally. We had just opened
20 up our breakfast shift, as things picked up we
21 will have more shifts. But he never was
22 understanding that it was only for -- that he
23 only had requested breakfast shifts, so that's
24 the shifts that I was giving him.

25 Q When he complained to you on or about

1 this date, did he ever mention anything to you
2 about discrimination?

3 A No, ma'am.

4 Q Did he ever mention anything about
5 discrimination at any other time in August or
6 September of 2021?

7 A No, ma'am.

8 Q Let's go to paragraph 38, it says:

9 "Following plaintiff's complaints about
10 discrimination in plaintiff's presence, Natalie
11 Cohee telephoned HR."

12 Is this accurate, according to you, or
13 this never happened?

14 A No, ma'am, nothing about
15 discrimination.

16 Q Right, but did you ever call HR in
17 plaintiff's presence?

18 A Yes, ma'am. Well, not directly in
19 his presence, I had made the phone call and
20 then went and got the plaintiff.

21 Q What was it that you called about?

22 A I had contacted Hector at that moment
23 to let him know that I was having issues with
24 Abdel. And Abdel had made a comment to me, of
25 I know -- something along the effect of "I know

1 your type of people", and it just wasn't
2 sitting right with me at that moment.

3 Q What do you mean "your type of
4 people"?

5 A Exactly, that's what I did not
6 understand.

7 Q Did you find that to be
8 inappropriate?

9 A Yes, at that moment it was
10 unwarranted.

11 Q And when was this call with Hector?

12 A Uhm, the same day, whenever -- I
13 would have to look it up, like a phone record
14 at that moment. It would have probably been
15 around August 27th. So if he's saying 27th,
16 maybe it's the 27th or 26th. I'm not sure of
17 the exact date.

18 Q And do you know if Hector
19 memorialized this in some sort of a document,
20 in an email, a phone log, anything like that?

21 A I have no recollection of that.

22 Q And let's go to paragraph 39:

23 " While on a speakerphone, HR (name
24 currently unknown) promised to get back to
25 Nofal, but never did."

1 Do you have any reason to believe that
2 this is not accurate?

3 A I have no idea.

4 Q Let's go to paragraph 41.

5 And just for the record, what is your race
6 and national origin? And the reason I'm asking
7 is only related to this lawsuit.

8 A I'm white, American citizen.

9 Q Do you see where in the paragraph it
10 says -- paragraph 41 it says:

11 "Plaintiff is an individual who follows
12 Islam."

13 Did you know that he is Muslim?

14 A No, ma'am, not at that moment.

15 Q When did you become aware that he's
16 Muslim?

17 A At the moment, ah -- it was the day
18 that we were cooking bacon.

19 Q Was that September 6th?

20 A Yes, ma'am, I believe so.

21 Q How did you become aware of his
22 religion on September 6th?

23 A I was asking Nofal if he had ever
24 cooked bacon before, and he told me something
25 to the effect of no, I'm Muslim. I said, okay,

1 have you ever cooked bacon at the Marriott, you
2 worked Marriott 25 years, how do you not know
3 how to cook bacon at this point, something
4 along the effect of that.

5 Q And what did he respond to that?

6 A He said I cooked bacon there, but we
7 cooked it in the oven.

8 Q Did he mention anything about not
9 eating bacon because of his religion during
10 that conversation?

11 A No.

12 Q Let's look at paragraph 42:
13 "Pursuant to his religion, plaintiff
14 cannot eat pork."

15 Did you know that?

16 A No, I didn't -- we never got into a
17 discussion about him being able to eat it or
18 not. Once he said he was Muslim, that's it.

19 Q Let's look at paragraph 43:
20 "On September 6th, 2021 as plaintiff was
21 working next to the stove cooking the eggs,
22 Natalie Cohee rudely said to plaintiff 'move,
23 move, move'."

24 Is that accurate?

25 A No, ma'am, he was never cooking eggs

1 at any moment during these interactions.

2 Q But is it true that at some point in
3 September of 2021 you demanded that plaintiff
4 had to move, and you repeated "move" at least
5 three times?

6 A No, ma'am, that's inaccurate.

7 Q And let's look at paragraph 44:

8 "Although Natalie was aware that plaintiff
9 had issues with his toe because of his
10 disability and saw him limping, she kept
11 harassing him to move quickly to the end of the
12 cooking station, which was 30 feet long."

13 Is any of this accurate, according to you?

14 A No. Not -- incomplete, no.

15 Q Is there anything that is accurate in
16 this sentence?

17 A I had definitely mentioned to Abdel
18 that he needed to make sure to maximize
19 productivity, because at this point he was
20 falling immensely behind in getting the
21 breakfast set up at the point where we were not
22 able to open up breakfast on time.

23 Q Was he too slow, or what was the
24 issue with his performance?

25 A He was doing everything his way, and

1 his way only.

2 Q Let's look at paragraph 46. There is
3 a dialogue that, according to plaintiff,
4 happened between the two of you.

5 "Natalie Cohee rejected plaintiff's
6 suggestion and the two exchanged the following
7 statements:"

8 Natalie: "I know you're Muslim, you don't
9 like that (referring to pork.)"

10 Nofal: "Yes, I don't eat pork."

11 Natalie: "You should not work."

12 Nofal: "I don't eat it, but I cook it."

13 Natalie laughed: "I know where you are
14 coming from ... even sometimes you have to
15 taste this (referring to bacon) to do this
16 job."

17 Nofal: "Why comment?"

18 Natalie: "You don't like it, go home."

19 Is any statement in this paragraph
20 accurate?

21 A Uhm, not -- no, not at all how it
22 went.

23 Q Can you explain to me -- and you
24 started to, but can you explain to me in full
25 what was the dialogue from the very beginning

1 to the end, to the best of your recollection?

2 A Yes. To the best of my recollection,
3 was basically Nofal was at first shown how to
4 cook sausage on the flattop, the proper
5 procedure on how they cook sausage on the
6 flattop. Every single time I showed him, he
7 still had his way, so he would go back and do
8 it the wrong way. I showed him again.

9 So now it was time for the bacon. The
10 week prior I just showed him how to cook the
11 bacon on the flattop. At this point he puts
12 the bacon on the flattop, and basically makes
13 scrambled eggs out of bacon, is what I call it,
14 it's just mixing all of the bacon all over the
15 place, and not cooking it evenly. Which would
16 end up causing half raw bacon and half cooked
17 bacon.

18 The second time I came back over, I said
19 Nofal, you have to -- well, actually, I said,
20 Ab, you need to put the bacon on the flattop
21 and leave it there, let it cook, and then flip
22 it over. You can't scramble it around on the
23 flattop, or it's not going to cook evenly.

24 I come back over and I said have you ever
25 cooked bacon before. He said no. I think at

1 that point he said, no, I'm Muslin. I said,
2 okay, but you worked at the Marriott, so I know
3 you know how to cook bacon. Well, we cooked
4 bacon in the oven. And I said, okay, but we're
5 cooking it on the flattop. He said why can't
6 we cook it in the oven. I said the oven is on
7 the 32nd floor, are you going to run all the
8 way up to the 32nd floor to cook the bacon and
9 come back down here. We're doing 20 covers,
10 you were used to doing roughly -- I don't know
11 what number I said -- but it doesn't make sense
12 for us to go all the way to the 32nd floor to
13 cook bacon, when we can cook it here on the
14 flattop.

15 That's basically I think the end of the
16 conversation. It might have -- I think -- I'm
17 thinking about it. He was pretty adamant about
18 cooking it in the oven, and I kept telling him,
19 no, it has to be done on the flattop.

20 Q So you never encouraged him to try to
21 eat bacon, knowing that he's Muslim and knowing
22 that he is not able to eat it due to his
23 religion?

24 A No, ma'am. I worked 16 years in
25 kosher, I would never even insinuate that upon

1 anybody.

2 Q Let's look at paragraph 49.

3 "On September 10th, 2021, plaintiff
4 arrived to work at 12:30 p.m. and was called
5 into a meeting with a female employee, (Name
6 Currently Unknown), and Natalie Cohee."

7 Was there a meeting on September 10th?

8 A Sorry, what was that last part?

9 Q Was there a meeting on September
10 10th?

11 A It could have been September 10th,
12 either the 9th or 10th, yes, ma'am.

13 Q And do you recall having a meeting
14 with plaintiff and another female employee?

15 A Yes, ma'am.

16 Q And who was that other female
17 employee?

18 A Kylie Featherby.

19 Q And what happened during that
20 meeting, to the best of your recollection?

21 A Mr. Nofal was let go.

22 Q What was the reason for him being let
23 go?

24 A Code of conduct. Insubordination, I
25 think.

1 Q Who decided that that was the reason
2 for termination for plaintiff?

3 A It was literally, within the property
4 level, it was myself and Kylie. And then it
5 was sent off to Hector to be approved.

6 Q And anybody else?

7 A Those are the only three people, I
8 believe. Including myself.

9 Q So according to the responses that we
10 received from your attorney, aside from
11 yourself, other people that participated in the
12 decision to terminate plaintiff were also
13 Michael Roberts, who is the general manager,
14 and the others you mentioned, Hector, yourself,
15 and Kylie.

16 Do you know what was the input that
17 Michael Roberts did into the decision to
18 terminate plaintiff?

19 A He wasn't actually in the decision of
20 terminating, he was a witness to the blatant
21 insubordination from Mr. Nofal.

22 Q And when was he witness to that
23 incident?

24 A I would have to look at the notes. I
25 forgot what exact date, but it was roughly

1 around the 6th or 7th.

2 Q And when you mention notes, what
3 notes are you referring to?

4 A As in like the documentations that
5 they wrote for the writeup. The witness
6 statements, I guess you would call it.

7 Q When you say "they", who are you
8 referring to?

9 A Michael Roberts, and Chris Castiello,
10 and Robert Taylor, which was the director of
11 security.

12 Q Was the plaintiff given any document
13 on September 10th when he met with you and the
14 other employee, Kylie Featherby?

15 A As all policy is when you're given a
16 writeup, all requests go straight to HR for
17 them to give you the official copy. And we
18 informed him of that, and gave him Hector's
19 number that he could contact to get any
20 documentations that he would like.

21 Q So let me ask you, because this is a
22 "yes" or "no" question --

23 A Sorry.

24 Q Was he given a copy of that document,
25 or not?

1 A Not at that time, no.

2 Q Was he asked to sign that document,
3 though?

4 A Yes, ma'am.

5 Q Did he know what he was about to sign
6 or not to sign, was he given an opportunity to
7 review the document?

8 A Yes, ma'am.

9 Q And so did plaintiff, to your
10 knowledge, request a copy of it from HR?

11 A I have no idea.

12 MS. TATURA: I'm going to show you
13 one more document to look at, which will
14 be marked as Exhibit 2.

15 (Exhibit 2 marked for
16 identification.)

17 Q These are some emails that you
18 exchanged with the plaintiff on August 18,
19 August 19, and August 20, 2021.

20 If you need a little bit of time to look
21 at it, let me know, I can wait.

22 A I'm aware of them, ma'am.

23 Q Let's look at the email dated August
24 19, 2021 from you to plaintiff. And I just
25 have one question about the sentence that

1 starts with:

2 "Your 90-day probation period will start
3 on the 26th as part of the condition of
4 employment from when you were hired."

5 The question I have is why plaintiff's
6 probation period was about to start on August
7 26th, if he started his employment with
8 Margaritaville end of May?

9 A To my recollection, it's because of
10 the fact that he did not complete within the
11 90-day period. So because he took the leave of
12 absence, since he was granted the leave of
13 absence, his 90 days would restart because it
14 was within the 90 days.

15 Q And is there any policy that would
16 reflect that, or was that just your decision to
17 do that?

18 A That would be Hector or Pedro.

19 That's above my pay grade.

20 Q Did they give you some kind of
21 instructions, or how did you find that out from
22 Hector and Pedro?

23 A Yes, ma'am, Hector informed me that
24 he would have to start his 90-day probation
25 over.

1 Q Did he send you an email to that
2 extent, did he call you -- how did he let you
3 know about that?

4 A I do not recollect how, where I got
5 that from. Or when we spoke about it, I guess,
6 before I sent the email.

7 Q In other words, it wouldn't be your
8 decision to do that, that would be HR?

9 A Absolutely.

10 Q And do you know if any employment
11 that plaintiff had with Margaritaville before
12 taking his leave of absence counts towards this
13 90-day probation period, or not?

14 A I do not believe so, it was a
15 restart.

16 Q And was this policy applied to
17 everybody at Margaritaville in the same way?

18 A I have never had anybody that has
19 taken a disability or a leave of absence within
20 90 days, so I do not know.

21 MS. TATURA: Okay, I will show you
22 one more document. That will be marked as
23 Exhibit 3.

24 (Exhibit 3 marked for
25 identification.)

1 Q Let me know if you need a few minutes
2 to look at it.

3 A I got it.

4 Q Have you seen this document before?

5 A Yes, I believe so.

6 Q When was the last time you've seen
7 it?

8 A I can't -- I don't know exactly when,
9 I've just seen the document.

10 Q Okay. And what do you recognize this
11 document to be?

12 A The Americans with Disabilities Act,
13 basically, going over everything.

14 Q So this document is only two pages,
15 as you can see.

16 Do you know if this is the entire policy
17 that Margaritaville has as to Americans with
18 Disabilities Act, or is there something else in
19 addition to these two pages?

20 A I do not know if there is more pages
21 that they have besides our training -- there
22 might be another training that would have been
23 done.

24 Q But you're not sure?

25 A I'm not sure, ma'am.

1 Q Would you be able to go back to your
2 computer, or log-in and check if there is
3 anything else that Margaritaville has as a part
4 of its policy as to the Americans with
5 Disabilities Act -- would you be able to do
6 that?

7 A Not at this current moment, no.

8 Q I mean in the future.

9 A Yes, I could.

10 MS. TATURA: Thank you. Let me show
11 you one more document. That will be
12 marked as Exhibit 4.

13 (Exhibit 4 marked for
14 identification.)

15 Q We are looking at the schedule from
16 July 19, 2021 to July 25, 2021.

17 Do you see this schedule?

18 A Yes.

19 Q It looks a little tiny. Let me know
20 if you need me to increase it even more.

21 A No, ma'am, I can read it.

22 Q Have you seen this document before?

23 A Yes, ma'am.

24 Q And do you know who printed this
25 schedule from, it looks like HotSchedules

1 application?

2 A That was probably myself.

3 Q And what was the purpose for you
4 printing it, if you recall?

5 A They asked me to print it out for his
6 scheduling. HR.

7 Q Okay, thank you. Was that Hector or
8 somebody else?

9 A That would have been Hector, ma'am.

10 Q And did he do that in writing, by
11 email, did he call you up -- how did he request
12 that you print it out?

13 A I think that was sent via email.

14 Q Do you see where it says Abdel Nofal,
15 the first employee --

16 A Yes, ma'am.

17 Q -- listed as the first employee on
18 the schedule?

19 A Yes.

20 Q And can you tell me by looking at
21 this schedule, what days was he scheduled to
22 work?

23 A This one he was scheduled Wednesday,
24 Thursday, Friday, Saturday, Sunday.

25 Q And by looking at this schedule, can

1 you tell me how many hours was he scheduled to
2 work on those days?

3 A Roughly 40 hours.

4 Q Do you see where it says, next to
5 "line", "line", "MV line"?

6 A Yes, ma'am.

7 Q Can you please tell me what "MV line"
8 stands for?

9 A That is the Margaritaville side of
10 the kitchen.

11 Q What's the significance of adding "MV
12 line" next to the employee's schedule?

13 A Each employee, that's their
14 designated, the line that they're working on.
15 So you will notice some say LandShark, some say
16 prep, some say Margaritaville line, each one of
17 those are the lines that they're working.
18 Which is basically the side of the kitchen that
19 they're working, because we have two kitchens
20 in one main kitchen.

21 Q So is "line" and "MV line" pretty
22 much the same type of work, it's just for two
23 different stations?

24 A It's two different physical lines on
25 the kitchen, yes. You could be a LandShark

1 line cook or a Margaritaville like cook,
2 basically, is what that is stating to you.

3 Q Okay, thank you. Based on this
4 schedule, is line, MV line different from other
5 employees here marked as cook, prep?

6 A So if you have line, LandShark line,
7 Margaritaville line, those are line cooks. If
8 you have cook slash prep line, those are prep
9 cooks. It's the way the system calculated --
10 that's the way you schedule it to help identify
11 when you print the schedule, to let the people
12 know which area of the kitchen they're going
13 to.

14 Q But is it fair to say that all of
15 those employees are in the same shoes,
16 similarly situated?

17 A No, ma'am.

18 Q Why are they not similarly situated?

19 A Prep cooks are prep cooks, so it's a
20 prep line. Line cook Margaritaville is a
21 Margaritaville line cook, it's a station cook.
22 LandShark line, those are station cooks as
23 well. So prep cooks and dish as you will see,
24 are not all the same.

25 Q I mean like salary-wise or the

1 sophistication of the duties, are they in any
2 way different or are they the same?

3 A Yes, ma'am, they are different.

4 Q Different. So is it fair to say that
5 on this particular schedule, employees, such as
6 Christopher, which is number 7, and Manuel at
7 the end, if you can see, and Marcelo, they are
8 all in the same position as Abdel, because they
9 are all marked as "line", "line" and "MV line"?

10 A Yes, line, line, and MV line are all
11 the same positions.

12 MS. TATURA: Thank you. Let's look
13 at another exhibit. That will be marked
14 as Exhibit 5.

15 (Exhibit 5 marked for
16 identification.)

17 Q We are looking at the schedule from
18 August 23, 2021 to August 29, 2021. Let me
19 know if you need a few minutes to look at it.

20 A No, I know exactly which one this is.

21 Q And have you seen this document
22 before?

23 A Yes, I have seen this.

24 Q Do you see where next to Abdel, the
25 plaintiff in this case, it no longer says "MV

1 line" it only says "line".

2 Do you see that?

3 A Yes, ma'am.

4 Q Is there any reason why "MV line" was
5 removed from Abdel's schedule?

6 A This is a breakfast cook position,
7 and actual food was being -- although it's
8 Margaritaville, was actually being cooked on
9 the LandShark side. But since he was on the
10 Margaritaville original side, he would just
11 have the line cook position, because it would
12 confuse everyone if I put LandShark line cook,
13 because there was nothing to be done in the
14 morning on LandShark line, so he became the
15 breakfast position, which is just line cook.

16 Q But he never worked at the LandShark
17 line; did he, before?

18 A He never, ah -- that's kind of
19 difficult to answer, because yes, he was on
20 LandShark line, not a LandShark line cook.

21 We served breakfast on LandShark line, but
22 yet it's for Margaritaville. So it's a little
23 complicated, because of the way the kitchen is.

24 Q Is there any document that would
25 reflect the layout of the kitchen, of the

1 lines, of the stations?

2 A Yes, ma'am.

3 MS. TATURA: To the extent it wasn't
4 exchanged, I will put it in writing, I
5 just want to make sure we understand the
6 layout of the business.

7 Q And when you look at this document,
8 is it fair to say that Abdel, on Friday, was
9 scheduled to work at 8:00 a.m., to start work
10 at 8:00 a.m. and finish at 2:00 p.m., on
11 Saturday he was scheduled to start at 6:00 a.m.
12 and finish at 2:00 p.m., and on Sunday he was
13 scheduled to start at 6:00 a.m. and finish at
14 2:00 p.m.

15 Is this a fair statement?

16 A Yes, ma'am.

17 Q I know previously you mentioned that
18 it's unlikely that plaintiff would be scheduled
19 to start at 8:00 a.m., but is it possible that
20 he could start on August 27, 2021 at 8:00 a.m.,
21 according to this schedule?

22 A Yes, ma'am, that was referring to an
23 actual breakfast shift. Like I mentioned,
24 Friday is a prep day, so Friday he would work
25 an 8:00 a.m. shift. But for a breakfast shift,

1 he would never come in at 8:00 a.m., we would
2 be open already, so he would only work
3 6:00 a.m. But on a prep day like Friday was to
4 get ready for Saturday, yes, 8:00 a.m.

5 Q Is it fair to say that looking at the
6 schedule, Abdel Nofal worked only 20 hours
7 during this period?

8 A Yes, ma'am, due to the fact that he
9 was still on leave until the 27th, when he
10 returned back to work.

11 Q Let's look at the same employees that
12 we looked at in the previous schedule.

13 Christopher, Marcelo, Manuel, and I think
14 there was an employee named Khadijah, if I'm
15 pronouncing that properly.

16 Is it fair to say that these mentioned
17 employees worked substantially more hours than
18 Abdel Nofal, based on the schedule?

19 A Only because he was still out on
20 leave for disability leave, until the 27th.

21 MS. TATURA: Let's look at another
22 exhibit. That will be marked as
23 Exhibit 6.

24 (Exhibit 6 marked for
25 identification.)

1 Q And, again, if you need more time,
2 let me know, I can wait.

3 A Yes, ma'am.

4 Q We are looking at the schedule from
5 August 30th, 2021 to September 5, 2021.

6 And again, is it a fair statement that
7 there was no "MV line" next to Abdel Nofal's
8 name on the schedule?

9 A Correct.

10 Q And is it the same reason why "MV
11 line" was removed as you explained a few
12 minutes ago, when we looked at the Exhibit
13 number 4?

14 A Yes, ma'am. For allocating it as a
15 breakfast shift.

16 Q And is it fair to say that Abdel
17 again is scheduled to work only three days,
18 Friday from 8:00 to 2:00, Saturday from
19 6:00 a.m. to 2:00, Sunday from 6:00 a.m. to
20 2:00?

21 A Yes, ma'am, as requested to be a
22 breakfast cook.

23 Q Just respond to my question. I
24 understand that you're trying to provide
25 additional, but I don't want to strike that

1 from the record. So just listen carefully to
2 the question and respond to that, if you can.

3 Is it fair to say that Abdel Nofal worked
4 approximately 20 hours during this pay
5 period -- I mean during this period?

6 A Probably 24 something, yeah.

7 Q And let's look again at those
8 employees that we looked at previous schedule,
9 such as Christopher, and Khadijah, and Manuel
10 and Marcelo.

11 By looking at the schedule, is it fair to
12 say that none of them is working as little
13 hours as Abdel Nofal for this period?

14 A They were hired for a different
15 position.

16 Q But by looking at this schedule,
17 isn't it fair to say that they are working more
18 days, more hours than Abdel Nofal?

19 A Yes, ma'am, based off of their
20 position.

21 MS. TATURA: I'm going to show you
22 one more exhibit. That will be marked as
23 Exhibit 7.

24 (Exhibit 7 marked for
25 identification.)

1 Q Let me know if you need some time to
2 look it over.

3 A Yes, ma'am, I am familiar with this.

4 Q So we are looking at a witness
5 statement. It says your name on it and your
6 position. And it says:

7 "On Monday, September 7, '21, Abdel Nofal
8 multiple times became combative", and so on.

9 Isn't it true that Abdel did not work on
10 September 7?

11 A Yes, it was actually the Sunday.

12 Q So is it fair to say that you meant
13 to say September 6 and not September 7?

14 A Yes, ma'am, September 6.

15 Q Was this an oversight, an honest
16 mistake, or did you prepare this on
17 September 7?

18 A It was an oversight.

19 Q Let's go down to Section 1.

20 According to you:

21 "Please bump the screen, I had to ask more
22 than seven different times, to the point I had
23 to keep going behind the line."

24 The question I have is about seven
25 different times. Are we talking about the

1 September 6, or are you talking about seven
2 different times in the past, including
3 September 6?

4 A On September 6, that specific day, I
5 had to go seven, more than seven times. But,
6 yes, on the 6th.

7 Q Okay. And give me one second.

8 Right, we are looking at page 2 now. I
9 would like you to look at the end of the first
10 paragraph.

11 "Abdel was extremely combative with me the
12 entire morning."

13 The question I have, when you said "entire
14 morning", did you refer to the entire shift,
15 did you -- what did you mean by that, "entire
16 morning"?

17 A From roughly 6:00 in the morning
18 until the moment he left.

19 Q Would that be 2:00 p.m.?

20 A No, I think he left earlier. He left
21 without even coming to me. So I don't know, I
22 don't remember exactly what time he left. I
23 know that he never checked out with me, he just
24 left.

25 Q Would that be reflected on punch-in/

1 punch-out records?

2 A Yes, ma'am.

3 Q We are still looking at this
4 document. The question I have is about the
5 very last sentence of this statement, where it
6 says:

7 "Mike was present for this as well".

8 Do you know Mike's last name?

9 A Michael Roberts.

10 Q And do you know if Michael Roberts
11 prepared a statement just like other employees
12 did that you referenced before?

13 A Yes. Michael Roberts is the general
14 manager, he prepared a statement.

15 Q And do you know if the statement was
16 exchanged in this case through your attorney?

17 A Yes.

18 MS. TATURA: I will show you one more
19 document. That will be marked as
20 Exhibit 8.

21 (Exhibit 8 marked for
22 identification.)

23 Q We are looking at a performance
24 correction notice, dated, ah, I believe
25 September 6, 2021.

1 A Yes.

2 Q Is this your signature at the
3 manager's signature?

4 A Sorry, there's something on the
5 screen that's blocking it.

6 Q I'm sorry.

7 A No, it's okay. There, I got it.

8 Yes, ma'am, that's my signature.

9 Q Have you seen this document? Well,
10 obviously before you signed it, but --

11 A Yes, ma'am.

12 Q Have you seen it anytime recently
13 before your deposition?

14 A No, ma'am.

15 Q Is there any reason why there is no
16 signature by the plaintiff on this document?

17 A Yes, ma'am. That was to be given to
18 him with Chris Castiello and Michael Roberts
19 for the insubordination on the day of 9/6, but
20 Mr. Nofal walked out after the shift without
21 coming to speak with me after being requested
22 to come see me before he left.

23 Q How did you request him to come to
24 see you -- verbally, by email, text message?

25 A Verbally in the prep kitchen, as well

1 as no employee is allowed to leave or clock out
2 without getting checked out before he left.

3 Q Was there anybody that witnessed that
4 you requested Abdel Nofal to show up for that
5 meeting with you on September 6?

6 A There was many people in the prep
7 kitchen, I'm not sure if they would -- if they
8 would have ever heard that. I would never be
9 loud about that, that would be something more
10 quiet, not like "come see me now". It would be
11 more like I need you to come on a one-to-one
12 basis. I would never publicly put something
13 out like that.

14 Q Okay. Where did you get this form
15 from -- it looks like it's a standard form that
16 was issued by Margaritaville in 2014, and then
17 revised sometime later -- where did you get the
18 form?

19 A Out of my file compartment. I have
20 all of our company documents in folders.

21 Q And is there any reason why you
22 decided to issue that performance correction
23 notice for the incident that happened on
24 September 6, and did not issue any notice like
25 this in June as to the incident that you

1 described previously, raw meat handling,
2 mishandling, and the other incident that
3 happened a week later?

4 A Like I had mentioned before, those
5 were more of a corrective coaching type of
6 thing, a one-on-one based off of performance on
7 sanitation and safety.

8 That's not something that you would
9 immediately write somebody up for, unless if
10 they blatantly decided to continue to do
11 something so negligent. So I would never have
12 written somebody up for a one-time sanitation
13 safety issue. You've got to give them a shot
14 at this point.

15 Q By the way, when the health
16 department shows up for the inspection, are you
17 present for those?

18 A Yes, ma'am, I'm the only one that
19 walks them.

20 Q And what was the grade that
21 Margaritaville got in 2021?

22 A Uhm, no inspection was given in 2021,
23 as it was the grand opening. I think we
24 officially started getting our inspections in
25 August.

1 Q What was the grade -- go ahead.

2 A 99, 100, and 98.

3 MS. TATURA: Let me show you one more
4 document. That will be marked as
5 Exhibit 9.

6 (Exhibit 9 marked for
7 identification.)

8 Q Again, let me know if you need a
9 little bit more time to look at this.

10 A Yes, ma'am, I'm aware of that.

11 Q Have you seen this document before?

12 A Yes, ma'am, I created it.

13 Q When was the last time that you
14 looked at this document?

15 A Maybe a couple of weeks ago.

16 Q What was the reason that you looked
17 at it a couple of weeks ago?

18 A It was just a refresh on the case.

19 Q Was that -- did you discuss this
20 document with anybody other than your lawyer?

21 A No.

22 Q Is there any reason why plaintiff is
23 marked as part-time on this document?

24 A As just like he was hired, part-time.

25 Q But he didn't work part-time until he

1 took the leave of absence; correct?

2 A He was hired as part-time.

3 Q But any schedule we looked at prior
4 to taking a leave of absence, it looked like he
5 worked five days a week; didn't he?

6 A That was for the grand opening.

7 Q Was plaintiff offered an opportunity
8 to see this document?

9 A It was given to him.

10 Q So, yes, he was given an opportunity?

11 A Yes, sorry.

12 Q And did you exchange any emails with
13 Kylie Featherby regarding this particular
14 document on the day of or before September 10,
15 2021?

16 A No email regarding this. Not to my
17 recollection, no.

18 Q Did you take any notes that would
19 reflect any conversations you had with
20 Ms. Kylie leading up to this event on September
21 10, 2021?

22 A No, ma'am.

23 Q Can you please tell me whose
24 signature is that next to the staff member
25 signature?

1 A That's mine.

2 Q Okay, that's yours.

3 MS. CABRERA: Can we take a quick
4 break?

5 MS. TATURA: Yes.

6 (Recess.)

7 Q Did Margaritaville hire any new
8 employees during the time when plaintiff took
9 the leave of absence or after he came back?

10 A Yes, Margaritaville did.

11 Q How many employees did Margaritaville
12 hire?

13 A Roughly, maybe 100.

14 Q And were any of those employees that
15 were hired for the position of line cook, prep,
16 MV line?

17 A Yes. I think I was still filling my
18 shift. Yes.

19 Q How many line cooks were hired?

20 A I would have to go back and look.

21 Q And I will follow up in writing.

22 Is it true that Margaritaville paid
23 employees a referral bonus of \$200 for bringing
24 new employees?

25 A I do remember something about that

1 during the grand opening.

2 Q Are you aware that plaintiff filed a
3 complaint with the Division of Human Rights on
4 September 1st, 2021, just nine days before his
5 termination?

6 A Not before, no, ma'am.

7 Q Did Margaritaville provide any
8 uniform to the plaintiff during his employment?

9 A Yes, Margaritaville T-shirts.

10 Q How many T-shirts?

11 A Every employee is given two, with an
12 option to purchase at 50 percent off, more.

13 Q Anything else in addition to the two
14 T-shirts that Margaritaville provided?

15 A A Margaritaville hat.

16 Q That's it?

17 A Yes, ma'am.

18 Q Was there an incident where you sent
19 plaintiff home in order to get his uniform,
20 because he didn't have one for that day?

21 A Yes, Mr. Nofal came into work with
22 shorts and flip-flops. Or Crocs, sorry. My
23 bad, Crocs.

24 Q Is this what Margaritaville does to
25 employees who forget to bring their uniform for

1 their shift?

2 A If you don't have the proper uniform
3 to come and work in the kitchen, yes, you would
4 either have the option to go home and get it,
5 or resign from the shift for that day, which
6 then you would be documented for attendance,
7 basically a no call/no show because you were
8 not in proper uniform.

9 Q Is there any backup uniform that
10 Margaritaville provided to employees in case
11 they forgot to bring their uniform, or no?

12 A Not pants, no, ma'am.

13 Q You took some statements from
14 Margaritaville employees regarding plaintiff;
15 isn't that true?

16 A From Michael Roberts and Chris
17 Castiello, yes, ma'am.

18 Q And how about Robert Taylor?

19 A Robert Taylor, yes, ma'am.

20 MS. TATURA: We didn't have a
21 statement from Michael, so I'm going to
22 request a copy of that.

23 Q With regard to the --

24 MS. CABRERA: You do have it.

25 MS. TATURA: I'm sorry?

1 MS. CABRERA: You do have it.

2 MS. TATURA: No, we have Chris and we
3 have Robert. We don't have Michael.

4 MS. CABRERA: It's Bates stamped
5 000044.

6 MS. TATURA: Okay. I'll check on
7 that.

8 MS. CABRERA: It's right after
9 Chris's. It may be throwing you off
10 because it's in an email, and it's not in
11 the same -- it's not on the form. So
12 maybe you skipped over it.

13 MS. TATURA: Okay, give me one
14 moment, please.

15 MS. CABRERA: I could send it to you
16 right now if you want it.

17 MS. TATURA: If I have it, there is
18 no need to. But let me --

19 MS. CABRERA: Sure.

20 MS. TATURA: Yeah, I don't have it.

21 If you can send me a copy.

22 MS. CABRERA: Give me one sec.

23 (Off the record.)

24 Q Why did you take the statement from
25 Chris?

1 A From Chris, because I needed to have
2 a conversation with Abdel, and Chris was there,
3 and Abdel never had that conversation.

4 Q And Chris is your subordinate; isn't
5 he?

6 A No, Chris is the front of the house.
7 He is a general manager now, he was an AGM back
8 then.

9 Q So at the time you asked him to make
10 a statement he did not report to you?

11 A No, he did not report to me.

12 Q Did he draft his own statement, or
13 did you provide some assistance?

14 A No, he drafted his own.

15 Q And how about Robert, why did you
16 take a statement from Robert Taylor?

17 A Because at that time I knew I was
18 going to have a sitdown with Mr. Nofal with
19 Chris about the conduct and his behavior for
20 that morning. And Robert was in the kitchen
21 when Mr. Nofal had his outburst with me.

22 Q And Robert is in security; correct?

23 A Yes, ma'am, he's the director of
24 security.

25 Q Was he the director of security at

1 the time when you asked him to write a
2 statement?

3 A Yes, ma'am.

4 Q And so he was not your subordinate at
5 the time that you asked him to write a
6 statement; is that correct?

7 A No, we work for two different
8 companies. We don't even -- not even a part of
9 the same.

10 MS. TATURA: I'm going to show you
11 one more exhibit. That will be marked as
12 Exhibit 10.

13 (Exhibit 10 marked for
14 identification.)

15 Q You previously testified that
16 plaintiff did not reference anything to
17 discrimination when he made his complaints
18 about the hours. I just wanted to clarify, ah,
19 with the handwritten notes that you made.

20 Let me know if you need a minute to look
21 at it.

22 A Those are not my handwritten notes,
23 ma'am.

24 Q Who prepared this note?

25 A I do not know, actually.

1 Q Is this your -- is this not your
2 handwriting?

3 A No, ma'am, that's not my handwriting.

4 Q Can you read anything that is stated
5 in these notes? I had trouble understanding
6 all of it.

7 A It looks like, "Feels discriminated
8 because hours have --", something between, "--
9 he came back."

10 Q Do you see there is your name on the
11 upper right side of this document?

12 A Yes, ma'am.

13 Q Do you remember if there was any
14 meeting that you had with anybody that
15 potentially could be memorialized in this
16 document?

17 A This looks like possibly the phone
18 call that Hector had with Mr. Nofal.

19 Q Why would your name be on the
20 document with regard to the phone call that
21 Hector had with plaintiff?

22 A Because I'm the one that initiated
23 that phone call with Hector.

24 Q Do you have any notes of your own
25 reflecting the phone call that you had with

1 Hector?

2 A No, ma'am.

3 Q Is this the phone call that you
4 referenced previously that you may have a
5 record of regarding plaintiff?

6 A This is the phone call that I made to
7 Hector about the incident. I'm guessing it's
8 the one from the 27th that I had stated that I
9 had made the call to Hector.

10 Q And is it fair to say that the date
11 on this document says September 3, 2021?

12 A Yes, that's accurate.

13 Q You don't know if this is when the
14 notes were made or when the phone call took
15 place?

16 A I think that it's actually the date
17 that the phone call was made.

18 Q And isn't it true that only seven
19 days later plaintiff was let go from
20 Margaritaville?

21 A Yes, ma'am.

22 Q Have you seen this document before?

23 A No, ma'am.

24 Q Is this the first time you're seeing
25 it today?

1 A Yes.

2 MS. TATURA: Just give me one moment,
3 please. I believe I received an email,
4 I'm going to check.

5 MS. CABRERA: Okay.

6 (Off the record.)

7 Q Okay, let me ask you about this
8 document that we just looked at, the exhibit
9 marked as 10.

10 If you did not receive any complaints
11 about discrimination from plaintiff, why do you
12 think Hector would put in his notes upon
13 conversation with you that there were
14 complaints of discrimination?

15 A I don't recollect anything of him
16 saying discrimination that I heard in that
17 conversation.

18 That entire conversation, we put it on
19 speakerphone, and I know multiple times people
20 kept coming in and out, because we were in the
21 main dining room when I actually called Hector
22 and we were sitting at the table. So unless if
23 I did not hear him say something, Abdel never
24 came to me and said you're discriminating
25 against me, or anything in those words of, ah,

1 because of scheduling, or anything like that.

2 I don't recall him ever saying anything like
3 that.

4 Q And how long was that conversation
5 with Hector?

6 A Uhm, maybe five minutes. Five to
7 eight minutes, max. I mean, it was pretty
8 quick, actually.

9 Q Do you remember what else was said by
10 Hector to you with regard to plaintiff on that
11 day?

12 A No, the -- just throughout that
13 conversation, he had mentioned that -- he did
14 say that I cut his schedule, and Hector said,
15 well, we will look into the schedule.

16 But at that moment never were the words
17 like discriminating against because of the
18 schedule. The schedule was brought up of, oh,
19 why do I only have three days working, and then
20 I immediately followed with, no, you have four
21 days working this week, you're choosing not to
22 work on Monday because it's the holiday. And
23 he said, well, I want my full schedule. And
24 that's pretty much when Hector said, well, I will
25 look into the schedule change. And that's

1 about it.

2 It was more just about the scheduling of
3 him thinking that I was only giving him the
4 three-day work week, and he wasn't
5 understanding that it was just the breakfast
6 until we pick up.

7 Q Let's look again at this document. I
8 understand that you did not prepare it, but
9 because it may have memorialized something that
10 you spoke about with Hector, I would like to
11 look at it again.

12 So it looks like the first paragraph, as
13 you said, feels discriminated because something
14 about hours went down after he came back.

15 And then the third paragraph says, "feels
16 that discrimination", in parenthesis, and
17 correct me if that's not what you see.

18 A Yeah. It looks like that, yes.

19 Q Right, that's what I thought. And
20 then the next paragraph says something about
21 table 7. Do you remember talking to Hector
22 anything about table 7?

23 A I have no idea what table 7 --

24 Q And then the next paragraph, it looks
25 like, ah -- the sixth word looks like it was

1 retaliation, and not necessarily discrimination
2 right after that.

3 Do you see that?

4 A It informed him -- it sounded --
5 retaliation, not necessarily discrimination.

6 Yeah, I see that.

7 Q Do you remember talking to Hector
8 about anything related to retaliation,
9 discrimination?

10 A This looks like a conversation, that
11 he was talking with Hector.

12 Q And then the next page --

13 A I'm wondering at some -- I almost
14 want to say at some point, Hector or Abdel,
15 they, uhm -- it was a very hard language
16 barrier at that moment with Hector and Nofal
17 and with the speakerphone, and I almost believe
18 that they actually spoke together. I would not
19 have been able to hear that. I almost believe
20 that they actually had a conversation, because
21 of the language barrier that it was so hard to
22 understand, that Abdel took the phone and was
23 listening to him.

24 So I wish I could remember the full
25 conversation, but it almost reminds me of him

1 actually having the phone, because they
2 couldn't understand each other. Because I
3 remember at some point, ah, we have this light
4 show that comes on, and it became very loud,
5 and that's when they couldn't understand what
6 each other was saying, so Abdel was holding my
7 phone.

8 Q At some point there was a time when
9 the three of you were kind of communicating
10 using one phone?

11 A Yes. Originally it was on
12 speakerphone, yes, ma'am.

13 Q And during that phone call, to the
14 best of your recollection, there was no words
15 discrimination mentioned, retaliation; correct?

16 A Yes, correct. I don't ever remember
17 him ever saying that he felt discriminated on.

18 MS. TATURA: Okay, thank you.

19 Let's look at one more, and last
20 exhibit. That will be marked as
21 Exhibit 11, this document that I just
22 received from your attorney.

23 (Exhibit 11 marked for
24 identification.)

25 Q Can you see this document?

1 A Yeah.

2 Q Have you seen this document before?

3 A Yes, ma'am.

4 Q So you did request a statement from
5 Michael Roberts; correct?

6 A Yes, ma'am.

7 Q Is there any email that you sent to
8 Michael requesting such statement?

9 A No, this was actually requested on
10 the 6th. Michael Roberts had left the
11 building, and I had to remind him that he did
12 not submit the statement to send over to
13 Hector. So he had sent it via email, as he was
14 off.

15 Q Did you ask him to do that by phone,
16 by email, something else?

17 A Via phone and in person.

18 Q Not by email?

19 A No, not by email.

20 Q Is there any reason why there is this
21 huge space before the email we are looking
22 at -- do you know if there was any redaction
23 made before this email was produced to us?

24 A No, I think that's just the way it
25 came through on the scan, because it's

1 actually -- on the actual, that's the top. So
2 I think just the scan, I guess it came through
3 like that.

4 Q Okay. Well, let's look at it.

5 "Yesterday, September 6 in the morning, I
6 witnessed Chef Natalie asking Abdel multiple
7 times to do something, and he ignored her. He
8 was asked to lower the oz --"

9 What's oz?

10 A Ounces.

11 Q "-- ounces of the hash browns
12 repeatedly, and he didn't even acknowledge her.
13 He was then asked to bump the item once it was
14 made, and Natalie had to come around and do it
15 for him, because he wouldn't. Natalie asked if
16 I could be part of a sitdown after the shift.
17 This did not happen, as Abdel walked out and
18 left for the day."

19 I'm sorry, why did Michael not give you
20 the statement on the day when you asked him to
21 do that?

22 A He had left the building.

23 Q He forgot to give you the statement?

24 A Yes, ma'am.

25 Q And was he present through the whole

1 incident that allegedly occurred, according to
2 this statement?

3 A Yes, ma'am, he was there through all
4 of it.

5 Q So it sounds like at least three
6 people happened to be there on the day of when
7 you had an incident with Abdel -- Chris, Robert,
8 and Michael?

9 A Yeah, Chris was informed that I
10 needed to have a sitdown, because we always do
11 sitdowns with multiple managers, it's never a
12 one-on-one. So in any instance I will always
13 grab, the more managers the better, is like
14 what we call it. So I asked Christopher to be
15 a part of the sitdown. Michael Roberts was
16 directly involved, as he was pretty much working
17 expo that day with me, so he was in the kitchen
18 the entire time with me all morning during
19 breakfast.

20 Q And how about Robert, did he just
21 happen to pass by?

22 A Robert Taylor was doing his security
23 walk in the morning around 6:30, when Abdel was
24 being combative with me. To the point where he
25 had mentioned am I okay, do I need help.

1 MS. TATURA: Anjanette, I don't have
2 any further questions. I don't know if
3 you wanted to do any follow-ups.

4 MS. CABRERA: I have very limited
5 follow-up.

6 EXAMINATION

7 BY MS. CABRERA:

8 Q Natalie, why was Mr. Nofal only
9 scheduled for breakfast shifts when he returned
10 from his leave of absence?

11 A Because he was directly hired for
12 breakfast shift.

13 Q And counsel pointed out that there
14 were several other individuals, who were line
15 cooks, that were working more hours than
16 Mr. Nofal when he returned from leave.

17 Can you explain why that was the case?

18 A Yes, all of them were hired to work
19 lunch shifts and mid-shifts.

20 Q And so what does that mean?

21 A Lunch shifts you come in at 8 o'clock
22 and work until 4 o'clock. Mid-shifts can work
23 anywhere from 10:00 to 5:00, 6:00, 7:00, based
24 on business. Lunch work, basically the core of
25 our business, is the busiest, which is lunch,

1 so they were hired for lunch only.

2 Q Was Mr. Nofal given less hours when
3 he returned from leave because he had taken a
4 leave of absence?

5 A No, ma'am.

6 Q Was his schedule influenced at all by
7 the fact that he was Muslim?

8 A No, ma'am.

9 Q And what happened to the business
10 while Mr. Nofal was out on leave?

11 A So we had started with our grand
12 opening, which was very hectic and a lot of
13 hours for everybody.

14 As we started stabilizing and getting
15 opened, uhm, around October 1st, we started to
16 streamline our schedule into the actual
17 positions that everybody was hired, and to make
18 sure that everybody started working.

19 As we got to the middle of August, it was
20 talked about to start opening breakfast. At
21 that moment, it was mentioned that I'm the only
22 breakfast cook at this point, nobody has been
23 trained to do breakfast. Mr. Nofal had sent me
24 an email saying that he's ready to come back.

25 It was almost perfect timing for me, because

1 now I didn't have to work the breakfast shift.

2 Once he came back, he immediately started
3 as the first breakfast shift, and he worked
4 every breakfast shift that we had. And
5 business kind of stabilized, so people's hours
6 were starting to adjust to reflect that.

7 MS. CABRERA: Okay, I have no further
8 questions.

9 MS. TATURA: Thank you very much for
10 your time today.

11 THE WITNESS: Thank you.

12 THE COURT REPORTER: Ms. Cabrera,
13 this is district court, do you need a
14 copy?

15 MS. CABRERA: Yes, please.

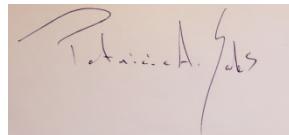
16
17 (Deposition concluded 12:32 p.m.)
18
19
20
21
22
23
24
25

1 C E R T I F I C A T E
2

3 I, PATRICIA A. SANDS, a Shorthand Reporter
4 and Notary Public of the States of New York and
5 New Jersey, do hereby certify that prior to the
6 commencement of the examination the witness was
7 sworn by me to testify the truth, the whole
8 truth and nothing but the truth.

9
10 I do further certify that the foregoing is
11 a true and accurate transcript of the testimony
12 as taken stenographically by and before me at
13 the time, place, and on the date hereinbefore
14 set forth.

15
16 I do further certify that I am neither of
17 counsel nor attorney for any party in this
18 action, and that I am not interested in the
19 event nor outcome of this litigation.

20
21 
22

23 New York Certificate No.: 01SA4974309

24 New Jersey Certificate No.: 2109345

WITNESS CERTIFICATION

I have read the foregoing transcript of my testimony and find it to be true and accurate to the best of my knowledge and belief.

[NATALIE COHEE]

Subscribed and sworn to
before me on this _____
day of _____, 2023.

Notary Public

* * *

1 ERRATA SHEET

2 Priority-One Court Reporting/Veritext
3 718-983-1234

4 ASSIGNMENT NO. P1-5820796

5 CASE NAME: Nofal, Abdelhafiz v. IMCMV Times Square LLC, Et Al.

6 DATE OF DEPOSITION: 3/21/2023

7 WITNESS' NAME: Natalie Cohee

8 PAGE/LINE(S) / CHANGE REASON

9 _____/_____/_/_____

10 _____/_____/_/_____

11 _____/_____/_/_____

12 _____/_____/_/_____

13 _____/_____/_/_____

14 _____/_____/_/_____

15 _____/_____/_/_____

16 _____/_____/_/_____

17 _____/_____/_/_____

18 _____/_____/_/_____

19 _____/_____/_/_____

20 _____/_____/_/_____

21 Natalie Cohee

22 SUBSCRIBED AND SWORN TO
23 BEFORE ME THIS _____ DAY
OF _____, 20 _____.
24

25 NOTARY PUBLIC
MY COMMISSION EXPIRES _____

&	15 30:20 16 59:24 175 2:7 18 63:18 19 63:19,24 67:16 19th 20:13,15 1:22 1:2 1st 86:4 102:15	55:20 56:3 60:3 63:19,24 67:16,16 71:18 71:18 73:20 75:5,5 79:25 82:21,22 84:15 84:21 86:4 92:11 2022 20:14 2023 1:18 39:9 105:14 21 1:18 3:25 77:7 2109345 104:24 212 2:4 22 40:1 22nd 10:9 23 40:13 71:18 24 3:23 41:11 76:6 25 55:2 67:16 25th 10:9,10 14:5,6 29:21 33:15 26 42:3,5,5 26th 53:16 64:3 64:7 27 73:20 27th 51:1,15 53:15,15,16 74:9,20 92:8 29 71:18 2:00 44:6,7 73:10,12,14 75:18,19,20	78:19 3 3 3:12,24 65:23 65:24 92:11 3/21/2023 106:3 30 43:3 44:3 56:12 30th 75:5 31st 29:22 32821 12:2 32nd 59:7,8,12 35 50:24 37 3:10 9:10 38 9:10 52:8 39 53:22 3:00 44:5,12,14 49:20
1	2		4
1 3:10 38:19,22 77:19 10 3:19 84:14 84:21 90:12,13 93:9 100 3:6 83:2 85:13 10006 2:4 10:00 101:23 10:07 1:18 10th 60:3,7,10 60:11,12 62:13 11 3:20 47:17 49:18,19 97:21 97:23 110 5:2 11:4 11201 2:8 115 5:2 11th 14:20 12:30 60:4 12:32 103:17 130 30:8 14 3:23 1420 2:3		4 3:5,13 67:12 67:13 75:13 101:22 40 69:3 402 2:7 41 54:4,10 42 17:24 18:2 55:12 43 55:19 44 56:7 45 2:3 28:12 46 57:2 49 60:2	

5	70 3:14 718-983-1234 106:2 72 3:24 73 3:15 75 3:16 78 3:17 7:00 44:15 101:23 7:30 47:10 7th 62:1	99 83:2 9th 60:12 a a.m. 44:5,6,7 44:12,14 47:10 47:12 49:19,19 73:9,10,11,13 73:19,20,25 74:1,3,4 75:19 75:19 ab 58:20 abdel 41:10 8 8 3:17 15:15 79:20,21 101:21 8079 104:21 82 3:18 825-1400 2:4 84 3:25 89 3:19 8:00 44:5,14 47:12 73:9,10 73:19,20,25 74:1,4 75:18	44:18,22 45:2 45:15,17 46:23 46:24 64:12,13 65:12,19 84:1 84:4 85:9 101:10 102:4 absolutely 16:12,18 65:9 accepted 14:5 access 24:12 28:1,6 31:16 accord 14:7 account 10:16 10:17,20,23 accounts 10:2 10:14 accurate 40:19 44:10 51:6,7 52:12 54:2 55:24 56:13,15 57:20 92:12 104:11 105:6 acknowledge 99:12 act 66:12,18 67:5 action 3:18 38:20 104:18 active 10:16,19 actual 7:6 11:18 33:7 50:15 72:7 73:23 99:1 102:16
6			
6 3:15 74:23,24 77:13,14 78:1 78:3,4 79:25 81:5,24 99:5 62 3:11 64 3:12 646-341-6544 2:8 66 3:13 6:00 44:6,7,12 44:15 47:10 73:11,13 74:3 75:19,19 78:17 101:23 6:30 100:23 6th 54:19,22 55:20 62:1 78:6 98:10	9 9 3:18 47:16 83:5,6 9/6 80:19 90 64:2,11,13 64:14,24 65:13 65:20 96 3:20 98 83:2		
7			
7 3:16 71:6 76:23,24 77:7 77:10,13,17 95:21,22,23			

actually 36:12 37:2 39:7 41:4 50:10,11 58:19 61:19 72:8 77:11 90:25 92:16 93:21 94:8 96:18,20 97:1 98:9 99:1 ada 3:12 adam 19:16,25 20:1 29:24 30:1,2,5 adamant 59:17 adding 69:11 addition 23:5 66:19 86:13 additional 20:21 75:25 address 9:15 11:5,16,19,24 12:4 adhere 31:8 adhered 17:11 17:11 adjust 103:6 adjustments 33:9 agm 89:7 ago 26:9 75:12 83:15,17 agreed 4:2,7,10 ah 10:9 12:17 12:23 23:7 29:8 43:13 54:17 72:18	79:24 90:18 93:25 95:25 97:3 ahead 83:1 akin 2:3 5:8 al 106:3 alert 23:25 allegations 39:23 allege 8:23 17:2 allegedly 100:1 allocating 75:14 allow 32:1 allowed 81:1 allowing 34:8 american 54:8 americans 66:12,17 67:4 anjanette 2:9 25:14 101:1 annual 26:13 26:16 annually 26:18 answer 28:17 48:5 72:19 antonio 13:12 anybody 7:10 16:14 17:1 18:16 22:21 24:22 33:2 39:18 43:23 60:1 61:6 65:18 81:3 83:20 91:14	anytime 32:16 80:12 anyway 26:5 aol 9:19 apologize 12:9 application 23:8,21 68:1 applied 65:16 appropriately 50:2 approved 42:19 61:5 approximately 29:15 76:4 april 11:12 apt 5:2 area 49:7 70:12 areas 18:21 arizona 8:5 12:19,20 25:7 arrived 60:4 aside 7:4 23:16 27:22 33:2 38:7 46:21 61:10 asked 15:16 33:13 51:16,18 63:2 68:5 89:9 90:1,5 99:8,13 99:15,20 100:14 asking 5:10 6:3 12:9 27:9 33:10 45:17 54:6,23 99:6	assigned 23:24 44:4,16,19 45:13 assignment 106:2 assistance 31:23 89:13 associate's 12:16,22 assume 5:22 attached 13:17 attendance 21:4 87:6 attention 22:3 37:24 attorney 7:1 61:10 79:16 97:22 104:17 august 13:3,4 38:14,15 42:5 50:6 51:1,15 52:5 53:15 63:18,19,19,23 64:6 71:18,18 73:20 75:5 82:25 102:19 authority 18:23 19:1 30:3 32:13 availability 11:22 avenue 5:2 11:4 12:1 average 17:24 18:1
--	--	---	---

aware	7:16 8:12,17,22 9:1 34:11 54:15,21 56:8 63:22 83:10 86:2	42:16 70:3 74:18 76:19 82:6 101:23	65:14 66:5 79:24 93:3 96:17,19	45:20,21,23,24 45:24,25 46:6 46:11,18,22
b		18:8,12,18 23:14,21 27:15	60:20 97:14 105:6	47:1,7,10,19 49:4,16,18 50:5,12,14 51:18,20,23
b	1:8 3:7	28:2 29:6,8 31:17 32:10	better 16:5 100:13	56:21,22 72:6 72:15,21 73:23
back	11:11 16:2 20:13,18 20:19 45:10,22 47:11 48:6 50:20 53:24 58:7,18,24 59:9 67:1 74:10 85:9,20 89:7 91:9 95:14 102:24 103:2	37:9 49:7,22 58:3,12 59:15 66:13 69:18 70:2 87:7 101:24	beverage 19:8 bias 29:6 big 15:13 birth 9:6 bit 63:20 83:9	73:25 75:15,22 95:5 100:19 101:9,12 102:20,22,23 103:1,3,4
backtrack	15:3	basis 16:10,16 16:23 17:4 30:22 43:21,24 81:12	blatant 61:20 blatantly 82:10 bleu 12:19 blocking 80:5 blood 40:7	bring 86:25 87:11
backup	87:9	bates 88:4 bayside 13:12	blue 41:8 bly 20:22 board 34:5 bodily 40:16	bringing 85:23
bacon	49:23 54:18,24 55:1 55:3,6,9 57:15 58:9,11,12,13 58:14,16,17,20 58:25 59:3,4,8 59:13,21	beef 34:2,4 36:2	bonus 85:23 booklet 23:14 born 11:1	broadway 2:3 brooklyn 2:8
bad	86:23	beginning 57:25	bounced 11:21 bouncing 13:25 break 6:1,5 85:4	brooks 2:7 brought 5:11 22:3,24 24:23 37:24 94:18
ballpark	44:12	behavior 89:19	breakfast 30:16 38:13,16	browns 49:10 99:11
bankruptcy	12:12	belief 105:7	44:5,20,23,25	buffet 45:8
barrier	96:16 96:21	believe 19:23 21:4 25:15 27:8 29:24	45:2,4,8,9,10 45:13,18,18,19	building 7:15 30:25 43:17 98:11 99:22
based	21:4 29:2 32:22,25 41:25	30:1 34:20 38:10 40:18 41:21 42:14 43:6,7,8 44:8 44:13 51:5 54:1,20 61:8	30:16 38:13,16 44:5,20,23,25 45:2,4,8,9,10 45:13,18,18,19	bulk 18:10,14 bump 77:21 99:13
				busiest 101:25 business 3:24 32:23,25 73:6

101:24,25 102:9 103:5 busy 31:22,25 c c 2:1,7 5:1 32:9 104:1,1 cabrera 2:9 3:6 25:21 26:3 40:11 85:3 87:24 88:1,4,8 88:15,19,22 93:5 101:4,7 103:7,12,15 calculated 70:9 call 23:15 52:16,19 53:11 58:13 62:6 65:2 68:11 87:7 91:18,20 91:23,25 92:3 92:6,9,14,17 97:13 100:14 called 52:21 60:4 93:21 cans 49:8 care 22:6 carefully 76:1 case 1:2 6:23 8:20 21:25 29:12 71:25 79:16 83:18 87:10 101:17 106:3 castiello 62:9 80:18 87:17	cause 29:8 36:17 causing 58:16 certificate 24:14 104:23 104:24 certification 4:4 105:1 certify 104:5,10 104:16 chain 22:16,17 change 29:9,9,9 94:25 106:5 characterized 40:6 charge 24:19 charles 19:16 check 67:2 88:6 93:4 checked 78:23 81:2 chef 13:6 17:6 20:4,7,11,20 32:16 36:9 37:10,25 38:1 41:14,20 99:6 chefs 35:2 chicken 34:3,4 36:3 choose 15:10 50:1 choosing 94:21 chris 62:9 80:18 87:16 88:2,25 89:1,2	89:4,6,19 100:7,9 chris's 88:9 christopher 71:6 74:13 76:9 100:14 chronic 40:6 circumstances 22:17 cities 13:14 citizen 54:8 city 5:2 11:4,13 claim 7:6 clarify 14:17 32:12 90:18 claudia 20:10 cleanliness 17:12 click 23:25 client 6:23 7:7 clock 81:1 closed 15:15,18 15:20 coach 35:7 coached 35:9 35:12 coaching 34:20 36:7,13 82:5 code 36:18 60:24 cohee 1:5 3:4 5:7 51:2 52:11 55:22 57:5 60:6 105:10 106:4,20	collection 8:5,9 com 9:18,19 combative 77:8 78:11 100:24 come 14:12 17:23 22:12,13 28:25 32:17 33:10 47:16,22 58:24 59:9 74:1 80:22,23 81:10,11 87:3 99:14 101:21 102:24 comes 97:4 comfortable 22:13,14 coming 28:21 57:14 78:21 80:21 93:20 command 22:16,18 commencem... 104:6 commencing 1:18 comment 52:24 57:17 commented 41:8 commission 106:25 communicating 97:9 companies 90:8
--	---	---	---

company 15:13 16:6,7 21:3 27:1,16 81:20	conducted 23:18 28:9	59:3,6,8,13,13 70:1,1,5,8,20	90:6 95:17 97:15,16 98:5
compartment 81:19	confuse 72:12	70:21,21 72:6	correction 3:17 79:24 81:22
complain 16:9 16:15,21 22:9 51:13	connection 47:25 50:22	72:11,12,15,20 75:22 85:15	corrective 82:5
complained 51:1,8,25	constangy 2:7	102:22	cortez 37:15
complaint 3:10 7:8 9:3 16:18 17:3,5 38:19 50:21 86:3	constantly 23:23 24:3	cook's 37:14 55:1,6,7 58:16	counsel 4:4 35:7 101:13 104:17
complaints 21:25 22:2 24:17 52:9 90:17 93:10,14	contact 62:19	58:25 59:3	counseled 35:10,13
complete 24:9 28:22 64:10	contacted 52:22	72:8	counseling 34:21 35:17
completed 24:11	contamination 34:9	cooking 37:6 49:9,22 54:18	36:7,13
complicated 72:23	continue 22:6	55:21,25 56:12	counts 65:12
computer 25:13 67:2	82:10	58:15 59:5,18	couple 83:15,17
concepts 6:22	continuously 23:24	cooks 3:25 18:4 18:5,5,11,14,17	course 28:11,14
concern 34:16	contract 21:3	18:18 31:1	courses 23:22 26:14 27:2,11
concluded 103:17	conversation 35:10 59:16	35:2 37:3 70:7 70:9,19,19,22	court 1:1 4:13 5:14 47:23
condition 64:3	89:2,3 93:13	70:23 85:19	103:12,13
conduct 26:2,3 36:18 60:24 89:19	contract 93:13 94:13 96:10,20	101:15	106:1
	96:25	copy 6:25 25:12,19 28:18	courtroom 6:13
	conversations 84:19	62:17,24 63:10 87:22 88:21	covers 59:9
	convicted 12:10	103:14	created 83:12
	cook 18:7,7,8	cordon 12:19 101:24	creek 12:1
	30:12,13,16	core 101:24	crocs 86:22,23
	31:4 37:7,19	corporate 37:25 38:1	croix 15:5,25 16:1
	41:18,23 42:1	39:12	crucial 34:13
	45:24,25 49:23	correct 32:14 41:18 75:9	culinary 12:17
	55:3 57:12	84:1 89:22	current 8:14 37:18 67:7
	58:4,5,10,21,23		

currently	12:24 17:16 19:4 20:3,20 53:24 60:6	86:20 87:5 94:11 95:4 99:18,20 100:6 100:17 105:14 106:22	department	18:21 21:19 22:4 24:18 25:1 82:16	dining 93:21 dinner 47:20 47:22 48:7,9
customers	31:14 47:8 48:9 49:5	days 10:10 43:3 43:19 46:2,2,4	depending	46:14	direct 5:5 16:4 32:15
cut	35:11 94:14	46:11,16,16,16	deposed	7:20	directed 22:4
cutting	34:5	46:18,18,19	deposition	1:4 6:19 7:11,13	directly 22:10 52:18 100:16 101:11
cv	1:2	50:5,9 51:17		80:13 103:17	director 62:10 89:23,25
d		64:13,14 65:20 68:21 69:2 75:17 76:18 84:5 86:4 92:19 94:19,21	described	82:1	disabilities
d	1:8 3:1 4:1	debt 8:5,9	description	3:8	66:12,18 67:5
dan	38:2	deceased 19:11	designate	33:3	disability 16:11 16:17,23 17:4
darius	20:5	december	designated	41:14 69:14	41:12 42:7,8
date	9:6 10:7 29:3,18 47:5 51:10 52:1 53:17 61:25 92:10,16 104:13 106:3	14:18,21 46:12	designed	26:20	51:4,11,12
dated	63:23 79:24	decide 39:8	despite	41:12	56:10 65:19
dates	14:23	decided 16:2	determined	74:20	
day	10:4,6 17:12,12,14,14 18:10,10 30:9 33:1,1 43:13 45:7 46:9 49:18,21 50:2 50:10,11,14,15 53:12 54:17 64:2,11,24 65:13 73:24 74:3 78:4 80:19 84:14	36:8 45:7 61:1 81:22 82:10	disagreement	37:8	
		decision 61:12 61:17,19 64:16 65:8	diabetes	40:5,9 40:14,20	discovery
		deer 12:1	dialogue	57:3 57:25	25:16
		defendant 1:9 8:13	diaz	21:7,8	discrepancy
		defendants 2:9	difference	18:6	14:17
		definitely 56:17	different	11:20 13:8,13 26:23	discriminated
		degree 12:16 12:18,22	difficult	69:23,24 70:4	16:10,16,22
		demanded 56:3	digits	71:2,3,4 76:14 77:22,25 78:2 90:7	91:7 95:13 97:17

29:4 52:2,5,10 52:15 90:17 93:11,14,16 95:16 96:1,5,9 97:15 discuss 39:20 83:19 discussed 39:17 discussion 55:17 disease 40:6 dish 49:7 70:23 dishwashing 18:5 district 1:1,1 103:13 division 86:3 doctor 43:1 doctor's 42:6 42:17,22,25 document 3:12 24:5 35:15 38:18,24 39:2 39:6,9,17 53:19 62:12,24 63:2,7,13 65:22 66:4,9 66:11,14 67:11 67:22 71:21 72:24 73:7 79:4,19 80:9 80:16 83:4,11 83:14,20,23 84:8,14 91:11 91:16,20 92:11	92:22 93:8 95:7 97:21,25 98:2 documentation 42:18 documentatio... 62:4,20 documented 87:6 documents 7:4 27:4 38:4 81:20 doing 18:11,12 30:7 31:2 37:11 38:16 49:22 56:25 59:9,10 100:22 dominguez 20:6 dot 9:18,19 doubletree 10:18 14:3,4 14:10,19,25 15:2,3,17 16:14,14 download 23:10 downstairs 32:1,6,8 draft 89:12 drafted 89:14 due 33:11 59:22 74:8 duties 17:7 31:3 41:13,23	71:1 e e 2:1,1 3:1,7 4:1 4:1 5:1,1,1 104:1,1 earlier 78:20 early 33:10 eat 34:5,6 55:14,17 57:10 57:12 59:21,22 eating 55:9 education 12:15 effect 4:12 52:25 54:25 55:4 effective 17:9 31:8 effectively 31:10 efrain 47:2 eggs 55:21,25 58:13 eight 9:10 94:7 either 19:20 43:6 60:12 87:4 elevated 40:7 eligible 30:7 email 3:11 9:15 9:22,22,24,25 9:25 10:2,3,5 23:25 28:25 39:21 43:5,7 53:20 63:23	65:1,6 68:11 68:13 80:24 84:16 88:10 93:3 98:7,13 98:16,18,19,21 98:23 102:24 emailed 10:4 emails 9:21 63:17 84:12 employed 12:24 19:10,17 20:8,25 37:16 43:21 employee 3:23 8:17,22 9:2 22:23 23:5 25:10,15,18 26:5,8 27:20 27:22 31:18 35:24 60:5,14 60:17 62:14 68:15,17 69:13 74:14 81:1 86:11 employee's 69:12 employees 17:21 18:24 21:25 22:8,19 23:4,17 24:6 30:8 31:16 32:23 47:6,14 47:16,21 48:8 49:3 50:7 70:5 70:15 71:5
--	---	---	---

74:11,17 76:8 79:11 85:8,11 85:14,23,24 86:25 87:10,14 employment 8:13,19,23 9:4 15:22 20:12 21:10 26:20 28:10,22 29:3 30:18,19 32:14 40:24 41:2,23 64:4,7 65:10 86:8 encouraged 59:20 ended 10:2 engaged 35:16 entire 17:22 66:16 78:12,13 78:14,15 93:18 100:18 entry 18:8,21 35:1 equal 18:15 equipment 49:8,25 errata 106:1 esq 2:5,9 essential 41:13 41:22 established 41:17 et 106:3 evenly 58:15,23	event 84:20 104:19 everton 20:22 everybody 23:13,20 26:14 34:11,16 36:12 43:13,16,17,24 65:17 102:13 102:17,18 exact 14:23 18:19 47:5 53:17 61:25 exactly 14:22 51:13 53:5 66:8 71:20 78:22 examination 3:3 4:5,11 5:5 101:6 104:6 examined 5:3 except 4:8 exchange 84:12 exchanged 25:16 57:6 63:18 73:4 79:16 excused 43:2 executive 13:6 17:6 20:4 24:12 32:16 36:9 exercise 40:16 exhibit 38:19 38:22 63:14,15 65:23,24 67:12	67:13 71:13,14 71:15 74:22,23 74:24 75:12 76:22,23,24 79:20,21 83:5 83:6 90:11,12 90:13 93:8 97:20,21,23 experience 34:25 expires 106:25 explain 57:23 57:24 101:17 explained 51:17 75:11 explaining 24:10 expo 100:17 extent 25:17 65:2 73:3 extremely 78:11 f f 4:1 104:1 facebook 10:15 10:22 fact 24:6 27:5 35:16 64:10 74:8 102:7 fair 43:20 50:6 70:14 71:4 73:8,15 74:5 74:16 75:6,16 76:3,11,17 77:12 92:10	falling 56:20 familiar 29:11 77:3 fax 43:5 featherby 19:10 39:19 60:18 62:14 84:13 february 14:15 39:3,6,9 feel 16:9 22:14 feels 91:7 95:13 95:15 feet 56:12 felony 12:10 felt 16:15,22 22:13,18 36:23 97:17 female 60:5,14 60:16 fiancé 16:2 file 35:20 81:19 filed 12:12 38:19 86:2 filings 4:5 filling 85:17 finally 44:22 find 28:20 50:3 53:7 64:21 105:5 fine 18:1 42:1 finish 40:11 73:10,12,13 fire 18:24
---	---	--	---

fired 9:3 14:8 15:23 19:22,25 20:1 21:5	44:17 46:22,24 51:3 52:9 57:6	fully 39:7,9 functions 40:17 further 101:2 103:7 104:10 104:16	23:8 31:17,20 32:1,3,17,17 35:20,23 40:1 48:21,25 49:1 49:20 50:20,24
first 17:5 29:14 33:21 34:21 35:6,25 36:2,7 36:12 37:22 38:18 45:5 58:3 68:15,17 78:9 92:24 95:12 103:3	follows 5:3 54:11 food 19:8 31:10 34:15 72:7 force 4:12	future 67:8 g	52:8 53:22 54:4 57:18 58:7 59:12 60:21,23 62:16 67:1 77:19
five 28:11 30:9 43:13 46:16 84:5 94:6,6	foregoing 104:10 105:4 forenoon 1:19 forge 13:11 forget 86:25 forgot 61:25 87:11 99:23	gestures 5:16 getting 30:24 43:14,16 56:20 81:2 82:24 102:14	78:5 83:1 85:20 87:4 92:19
flattop 58:4,6 58:11,12,20,23 59:5,14,19	form 3:18 4:8 81:14,15,18 88:11	give 36:7 50:22 62:17 64:20 78:7 82:13 88:13,22 93:2 99:19,23	goes 23:21 going 5:13 7:12 33:1 35:6 46:1 46:4,10 49:2
flip 58:21 86:22	former 20:11	62:17 64:20	50:21 58:23
floor 32:5,10 59:7,8,12	forth 11:11 104:14	78:7 82:13 88:13,22 93:2 99:19,23	59:7 63:12
floors 32:11	four 9:12 17:18	given 6:12 23:6 27:3,7 28:1 34:22 37:9,13	66:13 70:12
flops 86:22	17:18 46:16	39:12 42:19 43:8,8,25	76:21 77:23
florida 8:9 11:11,15,23 12:2 21:22 25:6	94:20	50:18 62:12,15 62:24 63:6 80:17 82:22	87:21 89:18 90:10 93:4
flyer 22:24	freestanding 13:17	84:9,10 86:11 102:2	gomez 20:6
flyers 23:5	friday 44:6	giving 51:24	good 5:7
folders 81:20	46:7,8 50:8,11	95:3	grab 100:13
follow 22:16,17 25:19,22 26:6 85:21 101:3,5	50:15,19 68:24	glucose 40:7	grade 64:19 82:20 83:1
followed 94:20	73:8,24,24	go 11:9 15:16	graduated 12:23
following 9:3 37:5,8,12	74:3 75:18	22:10,11,15,23	grand 30:6 33:6,14,15 43:24 45:6,6 82:23 84:6 86:1 102:11
	front 89:6		
	full 43:17,21,23		
	46:19 48:21		
	57:24 94:23		
	96:24		

granted 42:16 64:12 grill 41:15 group 5:8 guess 24:22 62:6 65:5 99:2 guessing 92:7 guides 27:2	hard 96:15,21 hash 49:10 99:11 hat 86:15 head 5:16 health 82:15 hear 19:14 93:23 96:19 heard 81:8 93:16 hearsay 37:2 hectic 102:12 hector 22:4,11 22:15,20 24:21 24:24 25:7 42:19 52:22 53:11,18 61:5 61:14 64:18,22 64:23 68:7,9 91:18,21,23 92:1,7,9 93:12 93:21 94:5,10 94:14,24 95:10 95:21 96:7,11 96:14,16 98:13 hector's 62:18	hello 30:23 help 70:10 100:25 hereinbefore 104:13 hereto 4:3 hey 35:25 higher 18:16 highest 12:14 hire 18:23 28:1 30:3,7 43:23 85:7,12 hired 3:25 13:7 13:24 14:4 29:19,25 30:8 30:11,14,15 44:21 47:3,4 51:18 64:4 76:14 83:24 84:2 85:15,19 101:11,18 102:1,17 hires 43:12 hiring 29:21 30:4,6,7 hoboken 5:2 11:4 holding 97:6 holiday 94:22 holidays 46:14 home 33:10 48:22 49:20 57:18 86:19 87:4	honest 77:15 honestly 11:18 hoping 50:21 hotel 11:8,13 11:16,19 13:18 15:17 hotels 11:20,25 13:13 hotschedule 28:2,23 hotschedules 23:20 67:25 hour 28:13 47:9 hours 24:7 33:3 43:25 44:17,17 49:14 51:3,9 69:1,3 74:6,17 76:4,13,18 90:18 91:8 95:14 101:15 102:2,13 103:5 house 89:6 hr 21:18 22:4 22:11,21 24:17 24:25 39:16 42:19 52:11,16 53:23 62:16 63:10 65:8 68:6 huge 98:21 human 86:3 hygiene 34:15
h	h 3:7 5:1 half 47:9 49:14 58:16,16 hampton 11:19 11:21 hand 5:15 handbook 3:23 23:5 25:10,18 26:5,8 handbooks 25:15 handed 42:18 handle 36:3 handling 36:2 82:1 hands 36:1 handwriting 91:2,3 handwritten 3:19 90:19,22 hanging 22:25 happen 36:1 48:20 99:17 100:21 happened 6:22 38:9 45:7		

i	including 22:11 61:8 78:2 incomplete 56:14 increase 67:20 index 3:21 indian 9:2 indiana 11:2 indianapolis 11:2 individual 54:11 individuals 101:14 influenced 102:6 info 3:21 information 25:3 27:16,23 informed 62:18 64:23 96:4 100:9 ingredients 31:13 34:7 48:14 initiated 91:22 input 61:16 insinuate 59:25 inspection 82:16,22 inspections 82:24 instagram 10:16,17,22	instance 100:12 instructions 64:21 insubordinati... 60:24 61:21 80:19 intention 8:18 interact 30:17 interaction 30:24 35:25 interactions 56:1 interested 104:18 interrupted 7:17 interviewed 14:19 29:23 investigation 22:7 24:16,20 involved 8:4,8 23:1 24:22 37:23 100:16 involving 8:5,9 irrelevant 15:19 islam 54:12 issue 36:16,22 56:24 81:22,24 82:13 issued 34:19 37:21 81:16 issues 33:25 52:23 56:9	item 99:13 items 18:14
			j
			janina 21:7,8 january 14:14 14:18,20,22 jason 19:6 jersey 1:17 5:2 5:2 11:4 104:5 104:24 job 1:23 15:8 36:21 41:13 57:16 josé 20:6 july 19:19,21 20:13 41:6 42:5 67:16,16 june 10:8 13:8 14:5,5,6 17:20 19:2,18,19,20 20:14,15 29:15 33:15,24 34:1 38:7 81:25
			k
			keep 77:23 kept 45:17 56:10 59:18 93:20 key 15:5 khadijah 74:14 76:9 kind 11:21 15:6 24:12 26:19 35:3 64:20

72:18 97:9 103:5 kitchen 18:22 22:25 31:17 32:9 49:6 69:10,18,20,25 70:12 72:23,25 80:25 81:7 87:3 89:20 100:17 kitchens 69:19 knew 89:17 know 5:20 6:2 6:21 10:6 11:18 15:19 22:19 24:1,2 24:19,24 25:4 25:5 26:23 28:25 29:18 34:23 35:22 36:10,11 38:3 40:8 41:1,4 42:12,15 44:16 45:17,22 46:1 47:5 52:23,25 52:25 53:18 54:13 55:2,15 57:8,13 59:2,3 59:10 61:16 63:5,21 65:3 65:10,20 66:1 66:8,16,20 67:19,24 70:12 71:19,20 73:17 75:2 77:1	78:21,23 79:8 79:10,15 83:8 90:20,25 92:13 93:19 98:22 101:2 knowing 36:20 59:21,21 knowledge 8:16,21 9:5 38:6 63:10 105:6 knows 37:10,11 kosher 15:14 59:25 kylie 19:10 39:19 60:18 61:4,15 62:14 84:13,20 I I 4:1,1 5:1 labor 45:7 46:9 landshark 69:15,25 70:6 70:22 72:9,12 72:14,16,20,20 72:21 language 96:15 96:21 las 13:11,18 late 33:11 laughed 57:13 law 5:8 lawsuit 5:11 7:6,24 8:2,14 9:23 10:23	39:24 54:7 lawyer 39:18 83:20 layout 3:24 72:25 73:6 le 12:19 lead 18:17,18 leaders 36:15 leading 84:20 learning 34:25 35:3 leave 14:7 31:20 32:1 42:7,9,12,16,20 43:10,22 44:9 44:17,22 45:1 45:15,16 46:22 46:24 48:25 51:4 58:21 64:11,12 65:12 65:19 74:9,20 74:20 81:1 84:1,4 85:9 101:10,16 102:3,4,10 leaving 48:21 left 14:5,9 50:18 78:18,20 78:20,22,24 80:22 81:2 98:10 99:18,22 letting 28:25 lettuce 36:4 level 12:14 18:8 18:19 32:9	35:1 61:4 levels 18:21 24:12 40:7 life 29:10 37:10 light 97:3 limited 101:4 limping 40:23 56:10 line 3:22,25 18:3,5,7,11,17 21:17 30:12,13 30:16,22 31:4 31:20,24 32:6 34:17 35:2 37:3,7,14,19 41:18,23 42:1 48:11,19,25 49:11 50:18 69:5,5,5,7,12 69:14,16,21,21 70:1,4,4,6,6,7,7 70:8,20,20,21 70:22 71:9,9,9 71:10,10,10 72:1,1,4,11,12 72:14,15,17,20 72:20,21 75:7 75:11 77:23 85:15,16,19 101:14 106:5 lines 69:17,24 73:1 linkedin 14:15 listed 68:17
---	--	---	--

listen	35:25 76:1	61:24 63:13,20 63:23 66:2	m	90:3,23 91:3 91:12 92:2,21
listened	24:7	71:12,19 73:7	ma'am	92:23 97:12
listening	96:23	74:11,21 76:7		98:3,6 99:24
literally	61:3	77:2 78:9 83:9		100:3 102:5,8
litigation		85:20 90:20	made	33:9 38:10 52:19,24
	104:19	94:15,25 95:7		90:17,19 92:6 92:9,14,17 98:23 99:14
little	28:16 63:20 67:19 72:22 76:12 83:9	95:11 97:19 99:4	main	12:5 18:9 69:20 93:21
live	11:7	looked 39:5 41:8 74:12	maintain	17:9
lived	11:3	75:12 76:8	make	7:16 17:13 31:6 33:7 36:1
living	11:24	83:14,16 84:3 84:4 93:8		48:22 49:9,9 49:10,10 56:18 59:11 73:5 89:9 102:17
llc	1:7 106:3	looking 67:15 68:20,25 71:17	makes	58:12
llp	2:7	74:5 75:4	making	17:10
located	21:21	76:11,16 77:4	management	
lodge	22:1	78:8 79:3,23		36:11
lodged	24:17	98:21	manager	7:15 28:24 31:25
log	27:18,23 28:2,4 53:20 67:2	looks 67:19,25 81:15 91:7,17		32:3 61:13 79:14 89:7
logan	20:5	95:12,18,24,25	manager's	80:3
long	11:3 12:3 14:23 28:8 56:12 94:4	96:10	managers	17:14,16,18 24:11 30:6
longer	20:25 45:14 46:25 71:25	lose 50:22		31:2 32:18
longevity	15:11	lot 34:23 43:15 43:16 102:12		33:5 100:11,13
look	38:17 39:9 40:13 41:11 42:3 44:3 53:13 55:12,19 56:7 57:2 60:2	loud 81:9 97:4 low 48:14 lower 99:8 lunch 47:13,17 48:20 101:19 101:21,24,25 102:1		

manner	31:10	67:13 70:5	meetings	38:4	mike	79:7
manuel	71:6	71:9,13,15	member	84:24	mike's	79:8
	74:13 76:9	74:22,24 76:22	memorialized	53:19 91:15	mind	11:9
marcelo	37:15	76:24 79:19,21		95:9	mine	85:1
	71:7 74:13	83:4,6,23	mention	52:1,4	minute	90:20
	76:10	90:11,13 93:9		55:8 62:2	minutes	28:11
march	1:18	97:20,23	mentioned			28:12 48:10
	11:12,13					66:1 71:19
margaritaville		married 12:7				75:12 94:6,7
1:8 5:12 7:11		marriott 55:1,2				mishandling
8:12,18,24		59:2				82:2
12:25 13:6,14		mass 30:7				misstate 19:20
13:21,25 14:12		matter 5:9 8:5				mistake 77:16
16:20 17:1,7		8:9				mix 49:9
19:12,17 21:1		max 94:7				mixing 58:14
21:18,24 23:1		maximize				moment 22:5
23:22 24:25		56:18				31:22 33:6
25:10 26:21		maximum				34:13,14,24
27:12,21 28:5		43:25				35:5 37:3
28:9 30:19		meals 31:13				52:22 53:2,9
36:6 40:24		mean 6:20				53:14 54:14,17
41:3,16,24		15:11,17,19				56:1 67:7
46:17 51:2,9		17:23 29:6				78:18 88:14
64:8 65:11,17		34:11 36:12				93:2 94:16
66:17 67:3		43:15 45:8				96:16 102:21
69:9,16 70:1,7		53:3 67:8				monday 77:7
70:20,21 72:8		70:25 76:5				94:22
72:10,22 81:16		78:15 94:7				month 15:15
82:21 85:7,10		101:20				45:6
85:11,22 86:7		means 22:14				months 26:9
86:9,14,15,24		meant 77:12				morning 5:7,9
87:10,14 92:20		meat 82:1				21:15 49:21
marked	38:18	media 10:14,22				72:14 78:12,14
38:22 63:14,15		meeting 60:5,7				78:16,17 89:20
65:22,24 67:12		60:9,13,20				99:5 100:18,23
		81:5 91:14				

move 16:2 55:22,23,23 56:4,4,11	60:6 99:6,14 99:15 101:8 105:10 106:4	53:25 55:16,25 59:20,25 65:18 72:16,18 74:1	105:17 106:24 note 42:17,22 42:25 43:2
moved 11:5 20:18	106:20	78:23 81:8,12	90:24
multiple 11:20 13:8 77:8 93:19 99:6 100:11	natalie 170 9:19 national 9:2 16:11,17,23 17:4 54:6	82:11 89:3 93:23 94:16 100:11	notes 3:19 6:22 7:1,4 28:15 61:24 62:2,3
murray 38:2	ncohee 9:18	new 1:1,16,17 2:4,4,8 5:2	84:18 90:19,22 91:5,24 92:14
muslim 54:13 54:16,25 55:18 57:8 59:21 102:7	necessarily 96:1,5	11:5,11 13:7 43:12 85:7,24	93:12
muslin 59:1	necessary 31:13	104:4,5,23,24	notice 3:17 20:18 69:15
mv 69:5,7,11 69:21 70:4 71:9,10,25 72:4 75:7,10 85:16	need 6:1 27:20 27:23 49:3	nine 86:4	79:24 81:23,24
	58:20 63:20 66:1 67:20	nods 5:16	noticed 33:22 33:25
	71:19 75:1 77:1 81:11 83:8 88:18	nofal 1:4 9:25 10:4 16:21	november 11:8 11:10
	90:20 100:25 103:13	29:12 34:2 37:9 46:25	number 3:8 9:13 59:11 62:19 71:6
n	needed 31:7 32:16 48:12 56:18 89:1 100:10	53:25 54:23 57:10,12,17 58:3,19 60:21 61:21 68:14	75:13
n 2:1 3:1 4:1 5:1	needs 32:22,25 34:22	74:6,18 76:3 76:13,18 77:7 80:20 81:4 86:21 89:18,21	o
name 7:18 27:24 37:14 53:23 60:5 75:8 77:5 79:8 91:10,19 106:3 106:4	negative 32:10 35:21,23	91:18 96:16 101:8,16 102:2 102:10,23 106:3	o 4:1 5:1 o'clock 47:16 47:17 49:18,19 101:21,22
named 8:13,22 74:14	negligent 82:11	nofal's 75:7	oath 6:9
natalie 1:5 3:4 51:2 52:10 55:22 56:8 57:5,8,11,13,18	neither 104:16	nolan 19:16	oatmeal 49:10
	never 16:18 20:1 41:9,19	normal 40:16	objections 4:8
	51:8,21 52:13	notary 1:16 4:12 104:4	obtain 12:18,21
			obviously 80:10
			occupational 12:17

occupying	20:3	open	11:14 14:12 15:16 30:24 43:17 45:23 47:17 50:5 56:22 74:2	origin	9:2 16:11,17,24 17:4 54:6	73:10,12,14 78:19 103:17 p1-5820796 1:23 106:2 page	66:14,19 66:20 paid
occurred	100:1			original	43:1 72:10		
ocean	15:4,11 15:22 16:3,8			originally	39:11 44:21 51:19 97:11		
october	102:15			orlando	12:1 15:16 21:22 25:8		
offer	14:6,11			ounces	99:10 99:11		
offered	84:7	opened	10:17 13:7 45:5 47:11 51:19 102:15	outburst	89:21	pamphlet	
official	62:17			outcome	104:19	pancake	49:9
officially	14:19 21:13 38:16 82:24	opening	21:12 21:12,13 30:6 33:6,14,15	oven	55:7 59:4 59:6,6,18	pants	87:12
oh	94:18			overseeing	44:3 50:24 52:8 53:22	paragraph	
okay	5:17 10:13 11:23 14:2,24 18:3 25:21 28:7 50:20,24 54:25 59:2,4 65:21 66:10 68:7 70:3 78:7 80:7 81:14 85:2 88:6,13 93:5,7 97:18 99:4 100:25 103:7	opens	47:10 17:15	oversight	77:15 77:18		40:1,4,13 41:11 42:3
old	9:9	operations	19:9	overstaffing	53:11		44:3 50:24 52:8 53:22
olenia	2:5 5:8			overtalk	47:24		54:4,9,10 55:12,19 56:7
once	24:9 26:18 42:18 45:6 46:25 55:18 99:13 103:2	option	23:10 86:12 87:4	own	6:21 14:7 14:9 23:2 30:4	parenthesis	57:2,19 60:2 78:10 95:12,15
ones	15:11 20:21	order	47:7,14 48:8 49:4,5,15 86:19	oz	99:8,9		95:20,24
online	23:6 27:10	organization	17:10	p			95:16
				p	2:1,1 4:1	part	13:21 27:5
				p.m.	21:16 44:5 44:6,7,12,14 48:15,16,18,23 49:20 60:4		28:22 60:8 64:3 67:3 83:23,24,25 84:2 90:8 99:16 100:15
						partial	48:5,5

participated	38:10 56:24	picked	51:20
61:11	79:23 81:22	picking	10:3
particular	82:6	picture	41:7
23:12 71:5	period	pictures	41:10
84:13	30:9	pigeon	13:11
parties	64:2,6,11	place	15:6
4:3	65:13 74:7	21:24 26:17	30:10 32:19
party	76:5,5,13	34:10 38:8	33:18,22 38:10
8:1	perjury	58:15 92:15	43:11 52:9,10
104:17	6:13	104:13	52:17 57:5
pass	permanent	plaintiff	64:5
100:21	12:5	1:5 2:5	plates 49:12
passed	person	5:9 8:20 9:23	platform 27:15
19:13	28:19	10:24 16:21	28:4
password	43:5,8,9 48:20	17:2 19:22,25	please 5:20
27:18,24	98:17	29:12,19,23	43:2 69:7
past	personal	30:3,14,18	77:21 84:23
78:2	9:16	31:4 32:13	88:14 93:3
patricia	9:18,22,24	33:4 35:10,13	103:15
1:15	10:3	37:20 39:24	point 6:21
104:3	personally	42:21,24	15:20 22:25
pay	25:9	33:4 35:10,13	31:1 35:3
64:19 76:4	42:21,24	40:5,8,14,23	36:15 37:11
paycor	personnel	41:1,7,12,22	49:24 55:3
23:9,9	3:18	42:6,9,15,22,25	56:2,19,21
pearl	phipps	43:20 44:4,16	58:11 59:1
2:7	20:22	46:21 51:1	77:22 82:14
pedro	phone	52:20 54:11	96:14 97:3,8
22:5,11	10:1	55:13,20,22	100:24 102:22
22:15,20 24:21	52:19 53:13,20	56:3,8 57:3	pointed 101:13
24:24 25:8	91:17,20,23,25	60:3,14 61:2	policies 23:3
64:18,22	92:3,6,14,17	61:12,18 62:12	31:9 37:6
penalty	96:22 97:1,7	63:9,18,24	policy 26:2,3
6:13	97:10,13 98:15	65:11 71:25	36:6,12 62:15
pending	98:17	73:18 80:16	64:15 65:16
6:3	phs	83:22 84:7	66:16 67:4
people	21:2,6 23:2	85:8 86:2,8,19	pomegranate
33:10,10	23:2	87:14 90:16	15:4,13
43:18 53:1,4	physical		
61:7,11 70:11	33:8		
81:6 93:19	69:24		
100:6	physically		
people's	30:21 44:1		
103:5	pick		
percent	16:5 95:6		
86:12			
perfect			
102:25			
performance			
3:17 33:18,19			
33:22 36:24			

pomegranate's	prepare	6:19 77:16 95:8	43:10,21 45:1 45:14,16 48:5 58:10 84:3 104:5	properly	74:15	
15:18	prepared	79:11 79:14 90:24	58:10 84:3 104:5	properties	15:5 15:12,23 16:4 16:8	
pop	preparing	6:24 11:14	priority	106:1	property	13:18 14:13 21:13 23:2 61:3
pork	presence	52:10 52:17,19	probably	36:25 53:14 68:2 76:6	prophete	2:7
55:14 57:9,10	present	13:4 79:7 82:17	probation	64:2 64:6,24 65:13	prove	24:6 35:16
portion	pretty	99:25 11:10 15:19 24:8 26:14,24 31:25	procedure	21:24 58:5	provide	5:21 6:4 75:24 86:7 89:13
39:13		34:13,16 35:20 43:13 44:11,13	procedures	23:3 31:9	provided	25:19 86:14 87:10
position		45:9 49:11,12 59:17 69:21	process	23:9 46:5	public	1:16 4:12 104:4 105:17 106:24
18:9 18:15 19:7 20:4 30:10,14 36:11 37:18 42:2 71:8 72:6 72:11,15 76:15 76:20 77:6 85:15		94:7,24 100:16	produce	31:10 48:13	publicly	81:12
positions	prevent	26:20	produced	6:25 98:23	punch	78:25 79:1
13:5 71:11 102:17	prevented	40:15	product	17:11 31:19,21 32:2	purchase	86:12
possible	previous	74:12 76:8		32:4 34:6,9 49:1,2	purpose	26:11 68:3
73:19	previously	24:15 73:17	productivity	56:19	pursuant	55:13
possibly		82:1 90:15 92:4	products	31:7	put	13:23 20:17 34:4 38:20 44:24 49:7
91:17	print	24:13 48:5,12 70:11	profound	15:12		58:20 72:12 73:4 81:12
post	printed	67:24	progressing	46:10		93:12,18
10:21	printing	68:4	promised	53:24	puts	58:11
posted	prior	11:7,14	pronouncing	74:15		
10:19		11:24 14:25	proper	37:6,12 58:4 87:2,8		
potatoes		15:2,3 21:12				
49:9 49:24						
potentially						
91:15						
prefer						
45:19						
prep						
18:5,6,8 18:10,11,13,13 18:14,18 31:5 31:17 32:9 48:12 50:15 69:16 70:5,8,8 70:19,19,20,23 73:24 74:3 80:25 81:6 85:15						

q	50:16 74:4 102:24 really 6:20,24 50:14 reason 13:22 15:7 19:23 34:19 37:20 39:5 40:18 41:21 45:12 51:5 54:1,6 60:22 61:1 72:4 75:10 80:15 81:21 83:16,22 98:20 106:5 recall 42:9 60:13 68:4 94:2 receive 23:17 25:9 26:19 42:21,24 43:4 93:10 received 27:2 29:3 39:13 61:10 93:3 97:22 receives 23:13 recently 80:12 recess 85:6 recipe 37:13 recipes 17:10 18:9 31:9 37:8 recognize 66:10	recollect 65:4 93:15 recollection 8:11 53:21 58:1,2 60:20 64:9 84:17 97:14 recommendat... 42:6 record 9:7 48:2 53:13 54:5 76:1 88:23 92:5 93:6 records 79:1 redact 9:7 redaction 98:22 reducing 51:2,9 refer 78:14 reference 90:16 referenced 7:5 79:12 92:4 referral 85:23 referring 57:9 57:15 62:3,8 73:22 refill 31:20,21 reflect 15:8 38:4 64:16 72:25 84:19 103:6 reflected 13:19 78:25 reflecting 91:25	refresh 83:18 refresher 26:13 26:15,16 regard 5:10 87:23 91:20 94:10 regarding 37:5 84:13,16 87:14 92:5 rehired 9:3 rejected 57:5 related 9:22 10:23 42:7 54:7 96:8 released 21:3,6 relevant 14:1 religion 54:22 55:9,13 59:23 remember 78:22 85:25 91:13 94:9 95:21 96:7,24 97:3,16 remind 98:11 reminds 96:25 removed 72:5 75:11 repeat 42:23 repeated 56:4 repeatedly 99:12 rephrase 5:20 report 16:5 19:4 32:15 89:10,11
r	r 2:1 4:1 104:1 race 54:5 rate 18:20 raw 34:2,3,4 36:2,3 58:16 82:1 reach 22:20 50:1 read 39:7,10 48:6 67:21 91:4 105:4 ready 30:24 34:5,6 43:15 43:16 45:23 47:7,14 48:8 49:4,16 50:7	reference 90:16 referenced 7:5 79:12 92:4 referral 85:23 referring 57:9 57:15 62:3,8 73:22 refill 31:20,21 reflect 15:8 38:4 64:16 72:25 84:19 103:6 reflected 13:19 78:25 reflecting 91:25	78:22 85:25 91:13 94:9 95:21 96:7,24 97:3,16 remind 98:11 reminds 96:25 removed 72:5 75:11 repeat 42:23 repeated 56:4 repeatedly 99:12 rephrase 5:20 report 16:5 19:4 32:15 89:10,11

reporter 1:15 5:14 47:23 48:6 103:12 104:3 reporting 106:1 represent 5:8 request 25:18 31:19,23 51:19 63:10 68:11 80:23 87:22 98:4 requested 3:21 31:11 44:24 51:23 75:21 80:21 81:4 98:9 requesting 10:4 98:8 requests 25:22 62:16 require 24:13 reserved 4:9 reset 49:20 reside 12:3 resided 11:8,17 11:24 residence 12:5 resign 14:10 15:24 20:16 87:5 resigned 19:18 19:21 21:11 resort 1:8 5:12	respective 4:4 respond 55:5 75:23 76:2 responded 10:1 response 5:21 6:4 48:4 responses 5:14 61:9 responsibilities 17:8 31:4 restart 64:13 65:15 restaurant 15:14,17 45:9 restaurants 13:16,17 15:4 15:14 restock 48:21 restocking 48:13 resume 13:20 13:23 14:14 retaliation 96:1 96:5,8 97:15 returned 44:8 74:10 101:9,16 102:3 review 63:7 reviewed 7:3 26:8 reviewing 26:12 revised 81:17	right 5:24 6:6 17:23 33:3 45:9 50:4 52:16 53:2 78:8 88:8,16 91:11 95:19 96:2 rights 86:3 robert 62:10 87:18,19 88:3 89:15,16,20,22 100:7,20,22 roberts 3:20 7:19 61:13,17 62:9 79:9,10 79:13 80:18 87:16 98:5,10 100:15 rodriguez 20:10 rolling 45:8 romaine 34:5 room 31:18 93:21 roughly 14:22 30:20 38:15 39:3,14 43:2 47:1 59:10 61:25 69:3 78:17 85:13 rudely 55:22 run 17:12 30:2 30:5 31:8,19 31:24 59:7	running 17:14 31:12 48:13 50:3 runs 48:24 s s 2:1 3:7 4:1,1 106:5 safety 82:7,13 salaam 8:23 salaman 2:3 salary 70:25 salmonella 34:12 san 13:12 sands 1:15 104:3 sanitation 34:14 82:7,12 sat 37:25 satisfactory 33:19,23 34:1 36:23 38:11 saturday 44:6 46:7,8 50:13 50:16,17 68:24 73:11 74:4 75:18 sausage 49:10 49:23 58:4,5 sauté 37:7,11 41:15 saw 39:1 56:10 saying 51:16 53:15 93:16 94:2 97:6,17
---	---	---	---

102:24	scramble	58:22	sends	24:10	setting	18:12	
says	scrambled		senior	20:7	setup	50:11,15	
14:14,15		58:13	sense	59:11	seven	43:19	
40:3 42:4			sent	8:18 9:25		46:2,11,18,19	
50:25 52:8	screen	38:21		39:11,14 61:5		47:18 77:22,24	
54:10,10 68:14		77:21 80:5		65:6 68:13		78:1,5,5 92:18	
69:4 71:25	sealing	4:5		86:18 98:7,13	several	101:14	
72:1 77:5,6	sec	88:22		102:23	severe	34:10,18	
79:6 92:11	secaucus	11:20		sentence	sexual	24:1	
95:15,20	second	50:23		56:16		26:23	
		58:18 78:7		63:25 79:5	sheet	106:1	
sc2	section	77:19		september	sheraton	15:5	
31:18 32:10	security	9:13		17:20 19:2	shift	17:12	
scan						18:11,13 20:2	
98:25 99:2	see	26:4 40:3		21:3,7,9,11		21:15,16 31:8	
schedule		62:11 89:22,24		62:13 75:5		31:8 33:9	
3:14,15 28:4		89:25 100:22		77:7,10,13,13		43:18 44:5,24	
32:20 33:8				77:14,17 78:1		45:2,3,19	
43:11,14 44:13	44:14,23 67:15	40:23 50:24		78:3,4 79:25		46:19,22 47:7	
67:17,25 68:18		54:9 66:15		81:5,24 84:14		47:15 48:15,16	
68:21,25 69:12		67:17 68:14		84:20 86:4		48:18,19,23,24	
70:4,10,11		69:4 70:23		92:11 99:5		49:4,16,17	
71:5,17 72:5		71:7,24 72:2		serve		50:12,13,15	
73:21 74:6,12		80:22,24 81:10		served		51:20 73:23,25	
74:18 75:4,8		84:8 91:10		72:21		73:25 75:15	
76:8,11,16		95:17 96:3,6		service		78:14 80:20	
84:3 94:14,15		97:25		serving		85:18 87:1,5	
94:18,18,23,25	seeing	92:24		46:18		99:16 101:12	
102:6,16	seen	38:24 41:9		47:8		103:1,3,4	
		66:4,6,9 67:22		set		shifts	44:20,25
scheduled		71:21,23 80:9		31:5 47:18		45:4,13,14,20	
68:21,23 69:1		80:12 83:11		48:23 49:6,12		46:10 47:1,9	
73:9,11,13,18		92:22 98:2		50:1,13,19		51:18,21,23,24	
75:17 101:9	scheduling	send	12:17	56:21 104:14		101:9,19,19,21	
		9:21 32:3		sets		101:22	
		65:1 88:15,21		18:20 35:4			
		98:12		35:4			
		sending	12:20				
		33:9					

shirts 86:9,10 86:14	single 58:6 sitdown 89:18 99:16 100:10 100:15	42:23 47:23,25 48:3 60:8 62:23 80:4,6 84:11 86:22 sitdowns 100:11 sitting 38:5 53:2 93:22 situated 70:16 70:18	staff 84:24 staffing 33:12 stamped 24:9 88:4 standard 81:15 stands 69:8 start 13:2 45:8 47:8,9 49:8 64:2,6,24 73:9 73:11,13,19,20 started 14:16 24:25 38:12,16 44:23 45:10 space 98:21 speak 7:10 80:21 southern 1:1 speakerphone 53:23 93:19 smith 2:7 social 9:13 10:14,22 somebody 29:7 31:23 32:3 35:6 36:20 49:1 68:8 82:9 82:12 sophistication 71:1 sore 42:14 sorry 9:11 11:9 11:12 15:2 19:14 20:15 25:2 33:13 35:11 40:10,12
--------------------------------	--	--	--

states 1:1,16 16:3 104:4	successful 15:21	system 70:9	taught 34:23
stating 70:2	sue 8:18	t	taylor 62:10
station 18:12 31:5,6,20 32:1 47:19 56:12 70:21,22	suffers 40:5	t 3:7 4:1,1 5:1 86:9,10,14 104:1,1	87:18,19 89:16 100:22
stations 41:15 47:18 69:23 73:1	suggestion 57:6	table 93:22 95:21,22,23	teaching 34:24
stayed 16:3	suitable 21:16	take 5:15 6:1,2 6:4 14:11 22:6 26:17 38:17 84:18 85:3 88:24 89:16	tech 48:2
staying 16:6	suite 2:3,7	taken 1:14 34:3 65:19 102:3 104:12	techniques 37:6
stenographic... 104:12	sunday 44:7 46:7,8 50:7,13 50:17 68:24	talked 102:20	telephoned 52:11
step 35:6,8 36:13	supervise 17:17 17:21 18:3 22:9	talking 10:7 77:25 78:1 95:21 96:7,11	tell 6:9 27:14 68:20 69:1,7 84:23
stipulated 4:2,7 4:10	supervisor 19:5 20:24 21:8,9	task 24:10	telling 59:18
storage 31:18	supervisors 17:19	taste 57:15	tennessee 13:11
stove 55:21	supervisory 32:13	tatura 2:5 3:5 5:6,8 25:14 26:1,4 38:17 47:25 48:3 63:12 65:21 67:10 71:12 73:3 74:21 76:21 79:18 83:3 85:5	term 42:7 51:3
straight 39:15 48:10,19 62:16	supplies 31:15	tests 28:17	terminate 61:12,18
streamline 102:16	sure 7:16 10:20 14:22 17:10,13 25:24 31:6	testify 6:16 104:7	terminating 61:20
street 2:7	33:8 36:2	testimony 1:14 6:12 104:11 105:5	termination 61:2 86:5
strike 75:25	48:22 53:16	tests 28:17	testified 5:3 14:16 90:15
stuff 39:15	56:18 66:24,25	texas 20:19	testify 6:16
submit 98:12	73:5 81:7	text 39:21 43:5 43:7 80:24	104:7
subordinate 89:4 90:4	88:19 102:18	thank 9:20 10:13 14:24	testimony 1:14
subscribed 105:12 106:21	surgery 41:2,5		6:12 104:11
substantially 74:17	sworn 4:13 5:3 6:9 104:7		105:5
	105:12 106:21		

19:15 28:7	51:17 56:5	106:3	transferred
50:20 67:10	61:7 75:17	timing 102:25	15:25
68:7 70:3	94:19 95:4	tiny 67:19	trash 49:7
71:12 97:18	97:9 100:5	today 5:15 6:9	tremper 19:6
103:9,11	throwing 88:9	6:12,16 7:17	trial 4:9
thing 15:15	thursday 68:24	9:9 46:17	trouble 91:5
82:6	tier 18:19	92:25 103:10	true 19:24 41:6
things 22:2	tim 20:22	today's 6:19	56:2 77:9
23:23 31:7	time 4:9 6:2	7:11	85:22 87:15
34:23 51:20	16:1 17:22,25	toe 40:15 41:7	92:18 104:11
think 10:2,15	24:9 26:7	42:14 56:9	105:5
10:17,18 11:6	29:14 31:1	together 96:18	truth 6:9 104:7
20:14 21:12,14	33:21 34:3,14	told 54:24	104:8,8
22:24 23:12	39:1,14 43:15	tomatoes 34:6	truthfully 6:16
26:25 27:7	43:16,21,23	36:5	try 59:20
28:12 29:20	46:9 47:6,13	took 27:5 42:6	trying 35:24
34:11,21,23	47:20 48:7	64:11 84:1	75:24
35:7 36:10	52:5 56:22	85:8 87:13	tuesday 1:17
39:13 43:1,18	58:6,9,18 63:1	92:14 96:22	turn 49:8,11
46:12 47:11	63:20 66:6	tools 31:7	turning 49:25
49:14 58:25	75:1 77:1	top 99:1	two 17:18
59:15,16 60:25	78:22 82:12	towards 65:12	20:17,21 21:12
68:13 74:13	83:9,13,23,24	trained 102:23	23:19 26:9,25
78:20 82:23	83:25 84:2	training 22:22	32:11 37:3,25
85:17 92:16	85:8 89:9,17	23:12,15,16,18	47:1 50:14
93:12 98:24	90:1,5 92:24	24:2,7 26:20	57:4,6 66:14
99:2	97:8 100:18	27:2 28:8,15	66:19 69:19,22
thinking 59:17	103:10 104:13	28:21 29:1,2	69:24 86:11,13
95:3	timely 31:10	35:1,5 36:15	90:7
third 95:15	times 1:7,8	36:16,16,20	type 23:13
thirty 9:10	14:12 27:1	43:14 66:21,22	30:23 36:13
thought 95:19	30:21 33:20	trainings 27:6	53:1,3 69:22
three 26:25	56:5 77:8,22	27:17	82:5
38:5 46:2,4,15	77:25 78:2,5	transcript 1:14	typically 22:15
46:18 50:5	93:19 99:7	104:11 105:4	

tyre 20:23,24	united 1:1 16:3	vp 19:8	46:15 58:10
u	university 23:22 27:13 28:5	vs 1:6	82:3 84:5
u 4:1	unknown 53:24 60:6	w	94:21 95:4
uhm 14:18 15:10 21:14 23:14 30:20 33:20 34:8 36:25 49:10 53:12 57:21 82:22 94:6 96:15 102:15	unwarranted 53:10	wait 39:8 63:21 75:2	weekend 45:7 46:9 50:19
uncomfortable 22:18	upcoming 50:8	waived 4:6	weeks 20:18 21:12 47:2 83:15,17
under 6:8,13 33:11	uploaded 23:23	walk 48:10,18 49:6 100:23	weird 25:24
underneath 17:13	upper 91:11	walked 20:1 80:20 99:17	went 20:13 21:2 26:22
understand 5:19 6:8,11 39:23 53:6 73:5 75:24 95:8 96:22 97:2,5	ups 101:3	walking 40:17	52:20 57:22 95:14
understanding 21:23 29:4 51:22 91:5 95:5	upstairs 32:6	walks 82:19	west 15:5
understood 5:22	used 59:10	want 19:20 35:22 73:5	white 54:8
unfortunately 37:1	user 27:23	75:25 88:16	wise 70:25
uniform 86:8 86:19,25 87:2 87:8,9,11	using 97:10	94:23 96:14	wish 96:24
	usually 28:15 48:19	wanted 21:15 22:9,12 90:18 101:3	witness 3:3,16 7:23 37:2
	v	wash 36:1	40:12 61:20,22
	vasquez 47:2	washington 20:23,24	62:5 77:4
	vegas 13:12,18	way 24:11	103:11 104:6
	venue 11:14	27:25 29:8	105:1 106:4
	venues 13:9,10 13:19	35:2 37:12	witnessed 81:3 99:6
	verbal 5:14 36:14 39:22	56:25 57:1	wondering 96:13
	verbally 34:21 39:20 80:24,25	58:7,8 59:8,12	word 95:25
	veritext 1:17 106:1	65:17 70:9,10	words 65:7 93:25 94:16 97:14
	versus 16:6 36:16,17 47:18	71:2 72:23	work 9:16,22 10:5 13:13,14
	virtual 1:17	82:15 98:24	14:2 15:1,13 21:2,15 25:6
		wednesday 68:23	
		week 23:14 37:1,21 38:8	
		46:2,3,5,8,11	

	works 25:7,8 write 35:6 82:9 43:14 44:1,4 45:13 47:6 48:12 49:3,15 50:17 51:3,9 57:11 60:4 68:22 69:2,22 73:9,9,24 74:2 74:10 75:17 77:9 83:25 86:21 87:3 90:7 94:22 95:4 101:18,22 101:22,24 103:1 worked 10:18 15:8 30:21 41:17 43:19 45:20 46:21,25 47:1 55:2 59:2 59:24 72:16 74:6,17 76:3 84:5 103:3 working 13:2 16:3 24:25 34:2,7,15,17 38:12 45:2,14 48:1 51:16 55:21 69:14,17 69:19 76:12,17 94:19,21 100:16 101:15 102:18	z zero 48:10
		x x 3:1,7 xx 9:8,8,8 y yeah 15:10 26:4 27:10 76:6 88:20 95:18 96:6 98:1 100:9 year 23:18 26:18 39:4 years 23:19 55:2 59:24 yesterday 99:5 york 1:1,16 2:4 2:4,8 11:5,11 13:7 104:4,23

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.